



UNITED STATES
ATOMIC ENERGY COMMISSION

~~XXXXXXXXXXXXXXXXXXXXXXXXXXXX~~
REGION II - SUITE 815
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In Reply Refer To:
RO:II:RFW
50-313/72-9

DIRECTORATE OF REGULATORY OPERATIONS

October 19, 1972

Arkansas Power and Light Company
Attn: Mr. J. D. Phillips
Vice President and Chief Engineer
Sixth and Pine Streets
Pine Bluff, Arkansas 71601

Gentlemen:

This refers to the inspection conducted by Mr. R. F. Warnick and other members of this office on September 13-15, 1972, of the activities authorized by AEC Construction Permit No. CPPR-57 for the Arkansas Nuclear One, Unit 1 facility, and to the discussion held with Mr. J. W. Anderson and other members of your staff at the conclusion of the inspection.

Areas examined during this inspection included turnover of equipment from construction, the preoperational testing program, administrative controls for the preoperational testing program, the quality assurance program for preoperational testing, and training. Within these areas, the inspection consisted of selective examinations of test procedures, the Plan For Preoperational Testing, OP 1004.09, system release packages for control rod drive cabinets and the integrated control and nonnuclear instrumentation systems, interviews with plant personnel, and observations by the inspectors.

During the inspection, it was found that certain of your activities appear to be in noncompliance with the Code of Federal Regulations. These items and references to pertinent requirements are listed in Enclosure 1 to this letter. Please provide us within 30 days, in writing, with your comments concerning these items, any steps which have been or will be taken to prevent recurrence, and the date all corrective actions or preventive measures were or will be completed.

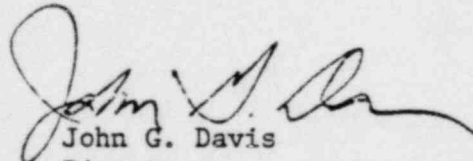
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October 19, 1972

Our inspection revealed several safety related systems and components outlined in the Guide for the Planning of Preoperational Testing Programs for which no preoperational test procedures have been identified. Enclosure 2 to this letter lists these systems and components. It is our understanding that you agreed that procedures will be written and tests performed on the systems and components as outlined in the Guide for the Planning of Preoperational Testing Programs or that you will provide justification demonstrating why the systems and components should not be tested. This matter will be examined during subsequent inspections.

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Very truly yours,


John G. Davis
Director

Enclosures:

1. Description of Items
of Noncompliance
2. List of Safety Related
Systems

ENCLOSURE 1
DOCKET NO. 50-313

Certain activities under your license appear to be in noncompliance with AEC regulations and your Final Safety Analysis Report as follows:

1. Criterion V of Appendix B to 10 CFR 50, "Instructions, Procedures, and Drawings," states, in part, "Activities affecting quality shall be prescribed by documented instructions . . . and shall be accomplished in accordance with these instructions"

Contrary to the above, tests are being conducted without an approved administrative plan or procedure covering these activities. Specifically, three preoperational tests have been initiated although the "Plan for Preoperational Testing" has not been approved.

2. Criterion XI of Appendix B to 10 CFR 50, "Test Control," states, in part, "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents"

Contrary to the above, a preoperational test procedure was approved with acceptance criteria that is not in agreement with the criteria specified in the FSAR. Specifically, TP 201 03, "Core Flooding System Functional Test," contains wider alarm setting tolerances than those specified on page 13-5 of the FSAR.

3. Criterion XIV of Appendix B to 10 CFR 50, "Inspection, Test, and Operating Status," states, in part, "Measures shall be established to indicate, by the use of markings such as stamps, tags, labels, routing cards, or other suitable means, the status of inspections and tests performed upon individual items . . . These measures shall provide for the identification of items which have satisfactorily passed required inspections and tests, where necessary to preclude inadvertent bypassing of such inspections and tests. Measures shall also be established for indicating the operating status of structures, systems, and components . . . such as by tagging valves and switches, to prevent inadvertent operation."

Contrary to the above, conflicting documentation regarding equipment released to operations for testing was noted. Specifically, the system release packages for startup systems 56 and 80 contained letters, drawings, and other documentation pertaining to the status of equipment which were in conflict with one another and did not accurately reflect the equipment status.

4. Section 13.1.2 of the FSAR for Arkansas Nuclear One, Unit 1 states, in part, "A station test coordinator will be assigned by the Station Superintendent for each test and coordinated by the Technical Support Engineer. His responsibility will be to develop the test procedure, coordinate the performance of the test"

Contrary to the above, it was determined through discussion with members of your staff that the station test coordinators are not being assigned to tests in time for them to have input to the test procedures while they are in the development, review, and approval stages.


ENCLOSURE 2
DOCKET NO. 50-313

Test procedures outlined in Guide for the Planning of Preoperational Testing Programs for which no procedures have been identified:

1. Emergency Boron Shutdown Systems
2. In-Core Monitor System
3. Steam Generator Pressure Relief and Safety Valves
4. Turbine Control and Bypass Valves
5. Loss of Instrument Air
6. Vital Bus Full Load Tests
7. Evacuation Alarm Test
8. Hydrogen Removal System
9. Containment and Auxiliary Structures Filter Tests

Letter to Arkansas Power and Light Company
dtd 10/19/72

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DIRECTORATE OF REGULATORY OPERATIONS
MONTHLY REPORT FOR SEPTEMBER 1972

Arkansas Power & Light Company (Arkansas Nuclear One, Units 1 & 2)
An inspection was conducted on August 29-31, which included review of documentation of reactor vessel and internals modifications, the control rod drive motor tube extension defect analysis, post tension system installation, the battery room ventilation system, the AP&L quality surveillance program, weld material control, and drawing control for Unit 1. The inspection also included review of records of concrete placement and preparations for concrete placement for Lift 1 of the Unit 2 containment wall. Two enforcement matters were identified; weld material control and drawing control. Immediate corrective action was implemented.

50-313
HMF