



HELPING BUILD ARKANSAS

ARKANSAS POWER & LIGHT COMPANY

May 20, 1976

Reactor Construction and Operations Branch  
United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region IV  
611 Ryan Drive, Suite 1000  
Arlington, Texas 76012

Attention: Mr. G. L. Madsen

Subject: Arkansas Power & Light Company  
Arkansas Nuclear One - Unit One  
Docket No. 50-313, License No. DPR-51  
IE Inspection Report No. 50-313/76-06

Gentlemen:

The subject inspection identified one violation of the Arkansas Nuclear One-Unit One Technical Specification and one violation of Criteria XI and XVII of Appendix B to 10 CFR 50. As applicable, our response to each violation includes (1) corrective steps which have been taken, and results achieved; (2) corrective steps which will be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. The NRC position on the cited violations and corresponding AP&L response are provided below:

1. NRC Position

Technical Specification 6.7.3 requires for procedures that, "Temporary changes which may affect the intent of the original procedure may be made, provided such changes are approved by the Plant Superintendent."

Contrary to the above requirement, temporary changes were made to Procedure 1502.03 on (or about) March 29, 1976 but the changes were not approved by the Plant Superintendent.

This is an infraction.

AP&L Response

Attachments "D" and "F" to Procedure 1502.03 (Preparation for Refueling) have been revised to reflect as-built conditions of the fuel handling equipment. Plant personnel have been admonished as to the requirements of section 6.7.3 of ANO-1 Technical Specifications and section 8.2 of Quality Control Procedure 1004.21.

It is our belief that we, at this time, are in compliance with section 6.7.3 of the Technical Specifications and QCP 1004.21.

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## 2. NRC Position

Criteria XI and XVII of Appendix B to 10 CFR 50 require that test record shall be documented. This requirement is further amplified by Section 11.4.2 of the Licensee's Quality Assurance Manual which requires that the test records shall include the test data.

Contrary to the above requirements, the licensee had been recording only the resultant boron concentration which was determined in the boron analysis of vessel and spent fuel storage water samples.

This is a deficiency.

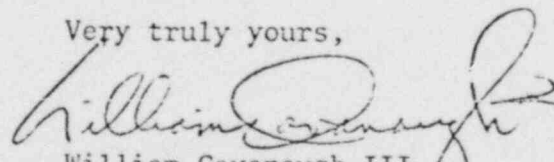
### AP&L Response

Our laboratory practices and record keeping methods have been reviewed as a result of this violation, and the following conclusions were reached:

1. Laboratory testing is done in strict accordance with written and approved procedures by qualified lab technicians whose training and experience is well documented.
2. Laboratory technicians work under the supervision of a well-qualified supervisor whose training and experience is well documented.
3. Data sheets indicating the final results of all laboratory test results are signed by the technician who performed the work and is reviewed by and signed by the laboratory supervisor in response to an earlier NRC inspection.
4. Recording of specific data to support a final result would not eliminate human judgment from laboratory work.
5. Standards delineating the specific data a well-qualified laboratory should keep do not exist.

Our laboratory record keeping methods have been carefully reviewed on several previous occasions by our own review bodies as well as NRC inspectors and compared with 10 CFR 50 Appendix B and our Quality Assurance Manual requirements and were judged to meet the requirements of these documents. Therefore, we are convinced that our laboratory record keeping methods meet the intent of all applicable regulations.

Very truly yours,

  
William Cavanaugh III  
Manager, Nuclear Services