



NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE. SUITE 1000 ARLINGTON, TEXAS 76011

October 23, 1980

TIC

In Reply Refer To: Docket Nos. 50-313/80-16 50-368/80-16

> Arkansas Power and Light Company ATTN: Mr. William Cavanaugh III Vice President of Generation P. O. Box 551 Little Rock, Arkansas 72203

Gentlemen:

Thank you for your letter of October 10, 1980, in response to our letter and Notice of Violation dated September 26, 1980. As a result of our review, we find that additional information is needed. Specifically, we continue to feel that you were in noncompliance as specified in item A of the above Notice of Violation and you are requested to respond within 20 days of the date of this letter with a written statement including: (1) the corrective steps you have taken and the results achieved; (2) corrective steps which will be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

In your letter you note that the QA Manual, the TS, and Procedure 1000.02 states, "The Plant Safety Committee is responsible for . . ." and that "being responsible for" the review does not require the actual review. We wish to call your attention to the fact that an NRC position on this issue was given to you during the final review of the Unit 2 TS. During a meeting in Bethesda, Maryland, on February 14 and 15, 1978, this position was provided to the AP&L staff by a member of NRR management. This position is stated on page 5 of the inspection report (50-368/78-04) which documents the above meeting.

The NRC position on the above PSC responsibility does allow the detailed review of material to be delegated as you have indicated in the case for QA audit reports. The NRC position states, however, that the final approval of the review by the delegated individual or group must be made by the PSC in a meaning and must be so documented.

8011110 228

Arkansas Power & Light Company -2-

Since Procedure 1000.02 uses the verbage, "The Plant Safety Committee shall be responsible for . . .," it is construed that this verbage carries the same connotation as that in the TS. Therefore, the fact that the reviews of QA audit reports by the Manager, Nuclear Quality Control were not reviewed by the PSC did violate the requirements of Procedure 1000.02 and thus the cited infraction is justified.

If you have any further questions regarding this issue, we would be pleased to discuss them with you.

Sincerely.

Madsen, Chief, Reactor Operations and Nuclear Support Branch

cc:

Arkansas Nuclear One ATTN: J. P. O'Hanlon, Manager P. O. Box 608 Russellville, Arkansas 72801

Victor Stello, Jr., Director Office of Inspection and Enforcement