



ARKANSAS POWER & LIGHT COMPANY
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December 9, 1980

1-120-04
2-120-10

Mr. K. V. Seyfrit, Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

SUBJECT: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Response to Inspection Reports
50-313/80-21 and 50-368/80-21
(File: 0232, 2-0232)

Gentlemen:

In response to the Items of Noncompliance included in the subject report, the following is provided.

NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of September 22 - October 21, 1980, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

Table 4.4.4 of Technical Specification 3.4.8 states, in part, that an "Isotopic Analysis for Iodine including I-131, I-133, and I-135" be taken ". . . between 2 and 6 hours following a THERMAL POWER change exceeding 15 percent of the RATED THERMAL POWER within a one hour period."

Contrary to the above, on August 23, 1980, the required isotopic analysis for Iodine was not made within 2 to 6 hours after thermal power changes exceeding 15 percent of the rated thermal power within a one hour period. Specifically, on August 23, 1980, between 0000 (midnight) and 0100 (1:00 AM-CDT) hours power was increased by 18 percent, between 0100 (1:00 AM) and 0200 (2:00 AM) hours power was increased by 18 percent, and between 0200 (2:00 AM) and 0300 (3:00 AM) hours power was increased by 24 percent; however, the

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required isotopic analysis for iodine was not made until 1050 (10:50 AM) hours.

This is a Severity Level V Violation. (Supplement I.E.) (368/80-21-01).

RESPONSE:

This violation has been reviewed by all Unit Two licensed personnel.

The power distribution and burn-up log has been changed to flag sampling operations requirements if power changes of >15% per hour have occurred. Full compliance has been achieved.

NOTICE OF VIOLATION

Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented, and maintained covering . . . a. The applicable procedures recommended in Appendix "A" Regulatory Guide 1.33."

- A. Operating Procedure 2102.02, "Plant Startup," has been established in accordance with this Technical Specification.

Step 13.9 in procedure 2102.02 requires, in part, that valve 2CV-0706 (the Startup and Blowdown Demineralizer supply to the Emergency Feed-water Pumps) be shut. In addition, a plant operator is required to initial the procedural step indicating its completion.

Contrary to the above, on October 15, 1980, valve 2CV-0706 remained open for approximately 45 minutes after step 13.9 of procedure 2102.02 had been initialed complete. During this 45 minute period, several other procedural steps had subsequently been completed as power escalation continued.

- B. Operating Procedure 2102.01, Attachment E, "Category E Valve Position Verification," has been established in accordance with this Technical Specification.

Attachment E of Operating Procedure 2102.01 requires that manual valve 2SW-17C be locked open. This valve is in the service water return line from the seal and bearing coolers for the "C" high pressure safety injection pump.

Contrary to the above, on October 16, 1980, the NRC inspector found that valve 2SW-17C was open as required, but was not locked.

This is a Severity Level V Violation (Supplement I.E.) (368/80-21-04 and 05)

RESPONSE:

(Item A) 2SW-17C was immediately locked open. On October 17, 1980, all other "category E" manual valves were verified locked in their required positions. Additional controls over all "category E" manual valves have been added to

the conduct of operations administrative procedure which should substantially reduce the probability of recurrence.

(Item B) The primary cause of the event was determined to be an excessive number of specific operations included in a single procedure step.

In order to minimize the probability of recurrence, the startup procedure has been revised to separate out those multiple operations into single, specific steps. Full compliance has been achieved.

NOTICE OF VIOLATION

Criterion V of 10 CFR 50, Appendix B, states that activities affecting quality shall be prescribed by documented instructions and shall be accomplished in accordance with these instructions.

The licensee has adopted a Quality Assurance Program to meet the requirements of 10 CFR 50, Appendix B, which includes a Quality Assurance Manual.

Section 5.5.2 of the Arkansas Power and Light Company Quality Assurance Manual - Operations (Rev. 4) states, "Applicable instructions, procedures and drawings shall be reviewed, and revised as necessary, following any modifications to the plant."

Contrary to the above, the applicable procedures and drawings were not revised following the performance of Design Change package 79-2036 performed under BWR 2-9095-79-9. This design change was completed in November 1979. It added a two-inch manual valve in the "C" high pressure safety injection pump recirculation line.

This is a Severity Level V Violation. (Supplement I.E.) (368/80-21-06).

RESPONSE:

The drawings have been revised to indicate that the DCP is pending (i.e., that a DCP is in progress). At the time of initiation of the design change and SWR, no controls were in effect for the identification of design changes which were in progress. Procedures are in effect now which flag the status of in-progress design changes on DCP's by marking the drawings to indicate a change is in progress and by making available in the control room details of the design change for review by Operations and Maintenance personnel.

An inspection will be conducted of design changes issued prior to implementation of the present design control procedures to ensure that plant drawings properly reflect the current status of all design changes on ANO-2. A similar review has previously been conducted for ANO-1. We expect this review to be complete by January 1, 1981.

December 9, 1980

NOTICE OF VIOLATION

Technical Specification 3.5.2 requires, when in Modes 1, 2, and 3, that two independent Emergency Core Cooling Systems (ECCS) subsystems shall be OPERABLE with each subsystem including one operable high pressure safety injection (HPSI) pump. Technical Specification 1.6 defines OPERABLE with the following statement:

"A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s)."

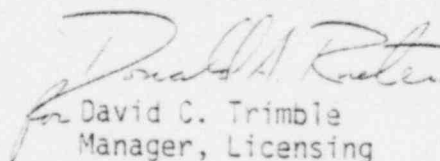
Contrary to the above, on October 15, 1980, only the "A" HPSI pump was operable with the unit operating in Mode 1. The "B" HPSI pump was out of service for maintenance and the operability of the "C" HPSI pump was degraded due to a removed access panel from 2VUC 11B, one of the air cooling units for the "C" HPSI pump room. With the access panel removed, air flow would bypass the unit's service water cooling coils and the ability of the cooling unit to perform its design function following a Design Basis Accident becomes questionable.

This is a Severity Level IV Violation. (Supplement I.D.3) (368/80-21-07).

RESPONSE:

The access panel was immediately installed on 2VUC 11B. The cause of the violation was insufficient procedural guidelines for the transfer of responsibilities for maintenance activities from one work group to another work group. Procedures will be revised to address the transfer of responsibilities to prevent recurrence. Full compliance will be achieved by December 31, 1980.

Very truly yours,


David C. Trimble
Manager, Licensing

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cc: Mr. Victor Stello, Jr., Director
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