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10/24/80

# BILL FOR COLLECTION

Bill No. \_\_\_\_\_

U. S. Nuclear Regulatory Commission

Date 11-17-80

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Date	DESCRIPTION	Quantity	Unit Price		Amount
			Cost	Per	
11/17/80	Full payment of civil penalty in connection with inspection reports IR 50-313/80-12 and 50-368/80-12.				\$21,500.00
<i>AMOUNT DUE THIS BILL,</i>					\$21,500.00

*This is not a receipt*

## INSTRUCTIONS

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LITTLE ROCK, ARKANSAS

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ARKANSAS  
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TO THE  
ORDER  
OF

U. S. NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

ARKANSAS POWER & LIGHT COMPANY  
GENERAL ACCOUNT

*John H. Steel*  
*Charles L. Steel*

TO: SIMMONS FIRST NATIONAL BANK  
PINE BLUFF, ARKANSAS

⑆08 2900432⑆ 00 140 007⑈

ARKANSAS POWER & LIGHT COMPANY  
POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4422

EA-80-65

WILLIAM CAVANAUGH III  
Vice President  
Generation & Construction

November 12, 1980

1-110-12  
2-110-18

Mr. Victor Stello, Jr., Director  
Office of Inspection & Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Arkansas Nuclear One - Units 1 & 2  
Docket Nos. 50-313 and 50-368  
License Nos. DPR-51 and NPF-6  
Response to Mr. Stello's letter concerning  
IR 50-313/80-12 and 50-368/80-12  
(File: 0232, 2-0232)

Gentlemen:

In response to the Items of Noncompliance included in the subject letter, the following is provided:

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 16.2.3 of the licensee's Quality Assurance Manual requires that the corrective action for deficiencies and nonconformances shall be prompt.

Based on the result of an NRC inspection conducted during the period of July 8 - August 9, 1979, a Notice of Violation was issued on August 24, 1979, for failure to conduct requalification lectures and to perform performance evaluations. The licensee, in its September 14, 1979 letter in response to the Notice of Violation, committed to take corrective action to preclude recurrences of such noncompliances including incorporation of a notification requirement in the Training Implementation Procedure and the development of an evaluation status log.

Contrary to the above, as of July, 1980, neither the notification requirement nor the evaluation status log committed to by the licensee had been implemented.

RESPONSE:

We acknowledge that as of July, 1980, neither the notification requirement nor the evaluation status log committed to for licensed operator requalification training had been implemented for ANO Unit 1. Notification and logs were used in administering the Unit 2 requalification training program during this time; however, supporting documentation is incomplete. Similar notification methods and logs were not used in a consistent and effective manner for ANO Unit 1.

The major cause for the commitment not being carried out was that it was not incorporated into a formal procedure with implementing management controls to assure that the commitment would be carried out in an effective and consistent manner. The corrective steps that have been taken to correct this deficiency are:

1. A notification method and Evaluation Status Log are being used for both units.
2. Training coordinators have been instructed in the use of the Evaluation Status Log and notification method.

To avoid further noncompliance, the mechanism utilized to track attendance of personnel at required lectures will be incorporated into Procedure 1023.01 "Station Training." However, if in the future, during our continued evaluation of procedures, a more effective method is recognized, Procedure 1023.01 will be revised to improve the method. AP&L intends to assure that this type of deficiency does not reoccur by having documented procedures and adequate management controls.

Compliance will be attained on or before December 31, 1980.

NOTICE OF VIOLATION

Based on the result of an NRC inspection conducted during the period of July 30 - August 10, 1979, a Notice of Violation was issued on December 6, 1979, that included an item of noncompliance with requirements for retraining and replacement training. The licensee in its January 25, 1980 letter in response to the Notice of Violation, indicated that corrective action would include a revision to the licensee's Training System to provide for training of certain positions to begin by the first quarter of 1980. In addition, the licensee committed to develop a procedure specifically to define training procedures including retraining requirements for all employees, and methods for evaluating training effectiveness.

Contrary to the above, as of July 1980, significant portions of the training committed to by the licensee had not been conducted. Furthermore, the procedure committed to by the licensee had not been implemented.

RESPONSE:

The training referred to is Systems Training. Systems Training consists of lectures on the major plant systems for Unit 1 and Unit 2. We acknowledge that Systems Training did not begin in the first quarter of 1980 as was expected. We acknowledge that as of July 1980, the committed procedure had not been implemented; however, no formal commitment date had been given to the NRC for implementation.

The major causes for these items of noncompliance were:

1. Training of certain positions to begin by the first quarter of 1980.
  - a. Prolonged startup of Unit 2 and the abnormal amount of unscheduled and TMI related outages adversely affected available training time.
  - b. Increasing the Training Section staff took longer than anticipated because the trainers come from Operations which was understaffed. This delayed development of the Systems Training Program.
2. Development of a procedure to define training requirements.
  - a. This procedure was to be developed in accordance with an overall plan and schedule for revising all ANO administrative procedures. A date of November 1, 1980 had been established for completion of the revision effort.

AP&L was remiss in failing to notify the NRC that Systems Training for maintenance personnel could not begin in the first quarter of 1980.

The corrective steps that have been taken include:

1. A Systems Training Course was developed and is currently being given to ANC personnel. The 2½-day course has been conducted weekly since August 28, 1980, and is scheduled weekly into December for the present ANO staff. As of November 1, 1980, Systems Training for the present personnel is approximately 55% complete. Those who do not attend by the end of the year will be scheduled during 1981.

2. Two training procedures, 1000.15, "Station Training Program", and 1023.01 "Station Training", were approved August 6, 1980 and September 8, 1980, respectively. Procedure 1000.15 describes the overall training program, and establishes general requirements and methods for the conduct of training. Procedure 1023.01 gives a comprehensive description of the overall requirements, controls, and standards for the development and implementation of the training program.
3. Training Section staffing has increased by six personnel thereby providing more resources to accomplish training.
4. Corporate personnel are being utilized to augment the training staff in conducting the Systems Training.

The corrective steps which will be taken to avoid further noncompliance in addition to those corrective steps listed above include:

1. Training procedure 1023.01 is being revised to incorporate additional information on current training programs including those addressed in Mr. Cavanaugh's letter to Mr. Seyfrit dated August 13, 1980.
2. The Systems Training Course is a part of the General Employee Training Program and new employees will be scheduled to attend this course within their first year of employment at ANO.

Compliance will be achieved on or before December 31, 1980.

#### NOTICE OF VIOLATION

Technical Specification 6.4.1 for ANO Units 1 and 2 requires that, "A retraining program for the facility staff shall be maintained and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix 'A' of 10 CFR Part 55."

10 CFR Part 55, Appendix A, paragraph 2, requires that the re-qualification program include preplanned lectures on a regular and continuing basis throughout the license period in those areas where annual operator and senior operator written examinations indicate that scope and depth of coverage is needed in specific areas, including plant instrumentation and control systems.

Contrary to the above, the annual operator and senior operator written examinations administered during May-June 1979 identified specific weaknesses in the area of instrumentation and control systems and lectures were not conducted on a regular and continuing basis to correct these specific weaknesses.



RESPONSE:

We acknowledge that the annual operator written examinations administered during May-June 1979 identified specific weaknesses in the area of instrumentation and control systems and lectures were not conducted on a regular and continuing basis to correct these specific weaknesses. This violation is primarily a result of being below authorized staffing in both the Training Department and Operations Department.

1. The ANO Operations Department was understaffed due to turnover of personnel and the time required to train replacement licensed operators. Primarily, Operations Training Coordinators have been licensed operators and have come from the Operations Department. As a result of the Operations Department being understaffed, this adversely affected requalification training.
2. During the months following the TMI event, both Operations personnel and the Training Department were responding to activities related to TMI and Crystal River and new NRC requirements, preempting the available time for scheduled requalification training.

To correct these deficiencies, the following actions have been taken:

1. Two major steps were taken to bring and maintain staffing to the required level. These were:
  - a. An increase in the operator pay and license bonus was implemented.
  - b. An aggressive recruiting program was undertaken to obtain the required number of people.
2. To reinforce the effort for licensed operator requalification training, the two existing Operations Training Coordinators were instructed on July 28, 1980 that their highest priority would be requalification training. This has resulted in an increased amount of time devoted to classroom requalification training.
3. With the addition of one additional training coordinator in November, 1980, the training group will be at its authorized staffing level. However, recognizing that even with this complement of manpower, we would not be able to accomplish the extensive training workload during the immediate period, three additional temporary trainers from consultants have been brought in to supplement the existing staff.



4. The 1980-1981 requalification RO and SRO exams have been graded, and training requirements based on exam results have been identified. The training has been scheduled and is currently being conducted.

To avoid future noncompliance, corrective steps in addition to those outlined above include:

1. An evaluation status log for Operations requalification training is being used to track identified training. The requirements for the evaluation status log will be described in Procedure 1023.01, "Station Training". However, if, as a result of our continuing procedure evaluation, a more effective method is recognized, Procedure 1023.01 will be revised to reflect the required method.
2. Where examinations identify specific weaknesses, lectures will be conducted on a regular basis to correct those weaknesses.
3. AP&L intends to assure that this type of deficiency does not reoccur by having documented procedures and adequate management controls.

Compliance will be achieved on or before May 31, 1981, when the present annual training cycle is completed.

#### NOTICE OF VIOLATION

10 CFR Part 55, Appendix A, paragraph 4.b, requires that the requalification program include written examinations which determine licensed operator and senior operator knowledge of subjects covered in the requalification program.

Contrary to the above, written examinations were not administered to several individuals who participated in the requalification program.

#### RESPONSE:

Annual examinations were administered to individuals who participated in the requalification program. However, we do acknowledge that re-examination of weak areas identified by the requalification examinations were not given.

This infraction was a result of understaffing in both the Training Department and the Operations Department as was previously discussed above.

To correct this deficiency, actions have been taken as previously discussed above.

To avoid further noncompliance, corrective steps in addition to the steps described above will include a revision of Procedure 1023.01 to require re-examination in weak areas. Adequate management controls will be applied to assure re-examinations are given.

Compliance will be achieved on or before May 31, 1981, when the present annual training cycle is completed.

#### NOTICE OF VIOLATION

Technical Specification 6.4.2 for ANO Unit 1 requires fire brigade training which meets or exceeds the requirements of Section 27 of the NFPA Code-1975 except that the frequency of training shall be six times per year. The Unit 2 Technical Specification, Section 6.4.2, requires the same scope and depth of training except that training shall be held quarterly.

Contrary to the above, during the period January to July 1980, fire brigade training was conducted only once for each Unit fire brigade.

#### RESPONSE:

We acknowledge that fire brigade training was not conducted during the second quarter of 1980.

The major cause for this infraction was due to a shortage of operator and trainer manhours available for training as a result of understaffing, unscheduled outages, new NRC requirements, and Crystal River and TMI related activities which necessitated many overtime hours to cover shift operations and reduced the time available for training.

The corrective action steps taken include:

1. A fire brigade drill was conducted July 25, 1980.
2. Fire brigade training was conducted the week of August 4, 1980 and has been scheduled and conducted weekly since August 28, 1980, thus insuring compliance with Technical Specification requirements.
3. The responsible Training Coordinator has been instructed to track Fire Brigade Training to further insure that Technical Specification requirements are met.
4. Due to an aggressive recruiting program, an increase in operator pay and license bonus, the number of operators has been increased. The increase in operators has resulted in additional available operator training time.

To avoid further noncompliance, corrective steps in addition to those corrections listed above include:

1. After evaluation of outside resources necessary to perform more extensive fire brigade training, the Arkansas State Fire Academy has been contracted to provide a training program with instructor for ANO fire brigade training.
2. Fire brigade training is scheduled to insure that Technical Specification requirements are met.
3. AP&L intends to assure that this type of deficiency does not reoccur by having documented procedures and adequate management controls

Compliance to this infraction will be achieved on or before December 31, 1980.

#### NOTICE OF VIOLATION

10 CFR Part 50, Appendix B, Criterion XVII, requires that sufficient records be maintained to furnish evidence of activities affecting quality. Further, Criterion XVII requires that records shall be identifiable and retrievable.

Chapter 17 of the Arkansas Power and Light Company Quality Assurance Manual states, in part, that "records storage shall provide for retrieval of information without undue delay," and that "permanent records shall be stored in the records vault...."

Contrary to the above:

Although sixty lectures were conducted for the Unit 2 requalification program, only twelve of these lectures were documented.

Although twenty-four lectures were conducted for the Unit 1 requalification program, only seventeen of these lectures were documented.

A record of respiratory protection training was not maintained for one member of the plant staff who had received the specified training.

#### RESPONSE:

We acknowledge that the training records for the instances cited did not meet the requirements.

The training records management system that was in use at the time of the inspection was put into effect in the middle 1970's. When the system was put into use, the volume of records was much less than today. At that time, only one or two filing clerks handled the training documentation. With the growth of the station, the Office Services function

was centralized and each department, including Training, was responsible for transmitting documents to the Records clerk for filing. The growth of the volume of documents was faster than the growth of the clerical staff that handled the documents. This increase in workload, and the inadequate training records management system, led to this deficiency.

To correct this deficiency, the following actions have been taken:

1. A clerk was assigned in August, 1980 to the Human Resources Section specifically to work with the training records.
2. Two temporary clerks were hired in August, 1980 to expedite entry of the training record backlog into the computerized records management system.
3. General employee records were examined and compared to the General Employee Training requirements. Training was performed and documented for any noted deficiencies.
4. Training coordinators were instructed that training must have completed documentation. Responsibility for documentation has been included in the Station Training Procedures (1000.15 and 1023.01).
5. Training records are being entered into the Records Management System. To date, approximately 75% of the backlog of records have been put into the system. Since September 1, 1980, the current training records are being entered into the existing computerized records management system subsequent to completion of the training.
6. During October, 1980, it was established that a training record exists for each employee.
7. A system has been implemented which assures that training is documented in each individuals training record.

To avoid further noncompliance, in addition to the actions listed above, a new computerized records management system to replace the existing system is being developed. The first module to be entered on this new system will be the training records. The new system, which is expected to cost \$700,000, will insure adequate capacity for records and information retrieval without undue delay. The new computer hardware is scheduled to be on site by the end of this year and operating by May 31, 1981. However, we have a training records system that meets the present requirements. A backup capability has been established to ensure the ability to retrieve training records.

Compliance will be achieved on or before December 31, 1980.

ACTIONS TO IMPROVE OVERALL CONTROL OF LICENSED ACTIVITIES

Your letter also asked us to describe the actions we have taken or plan to take to improve the overall control of our licensed activities to assure continuing compliance.

In order to ensure timely and adequate correction of the problem areas in our training program, we have initiated bi-weekly status reviews of training activities. These reviews are conducted with the Vice President, Generation and Construction, Director, Nuclear Operations, ANO General Manager and the ANO Training Staff.

We feel that we have made significant improvements in the quality and quantity of training at ANO. For example, between August 1 and October 24, 1980, 18,692 manhours of ANO staff time was devoted to training.

As you are aware, AP&L met with the NRC Region IV staff on August 11, 1980 to present the actions we had taken as a result of the NRC's inspection during July, 1980. We documented our presentation during this meeting in our letter of August 13, 1980 to Mr. K. V. Seyfrit. I am attaching a copy of that letter for your information. We have aggressively pursued each of the items outlined in this letter and have met each of the schedules provided and are continuing to complete each of the actions described.

In addition to the items covered in the attached letter, we have implemented a number of organizational changes which we feel will improve our overall operation. We have restructured our corporate organization to create a separate Nuclear Operations Department within Generation and Construction. Previously, Nuclear Operations was a section within the Generation Operations Department. The new Nuclear Operations Department has a Nuclear Services Section which will provide dedicated support to ANO and will function to coordinate the corporate office support for ANO. In addition, the corporate Plant Maintenance and Availability Engineering Section has been directed to make ANO its top priority and is now working on programs directed at improving the quality and effectiveness of the ANO management system and operation.

The ANO organization has also been modified to ensure improved management controls. The Operations and Maintenance Department has been separated into an Operations Department and a Maintenance Department. This change was required to ensure more detailed management control over these two key areas of nuclear plant operation. We have also created a Special Projects Group reporting to the General Manager. This group will be responsible for resolution and implementation of on-going projects as determined by the General Manager which will relieve this workload from the line managers and permit them to better control their areas of responsibility. The Manager of Special Projects will be the chairman of the on-site Plant Safety Committee. We have also created an Operations Assessment group on the ANO staff which will provide a de-

tailed review of plant operations and review the operating experience of other nuclear units. We have just recently increased and reorganized the staffs of the QA and QC groups based on an evaluation by an outside consultant. These changes will permit these groups to provide more and improved audits and inspections of our licensed activities. Management will continue to take action to resolve the problems identified by the Quality Program.

We have significantly increased the level of management involvement and review of our nuclear activities. The Vice President, Generation and Construction and Director, Nuclear Operations have been on-site for one or two days almost every week since mid-September of 1980 and have been deeply involved in specific areas of licensed activities, including: Training, Health Physics, Operations, and Maintenance. We expect to continue this level of involvement as necessary to ensure adequate attention and control. We have conducted detailed monthly briefings to the AP&L Chief Executive Officer and his key executive staff members of the on-going activities at ANO. To date, two of these briefings have been conducted at ANO. We are also providing periodic reports to the AP&L Board of Directors to ensure they are aware of activities impacting the safety and operation of ANO.

AP&L has initiated a number of specific programs intended to improve the overall management and control of ANO. Our August 13, 1980 letter to Mr. Seyfrit, described the Position Task Analysis (PTA) program which will certainly result in better definition of position responsibilities and more appropriate training programs. A Task Management System is also underway which is performing a detailed review of each of the functional areas at ANO. The purpose of this review is to evaluate the activities of each group, ensure adequate systems are available to permit the efficient utilization of existing manpower and to evaluate the need for additional manpower. AP&L is also in the process of implementing a new relational data base management information system. This system, when complete, will provide a powerful tool to assist AP&L management in the control of our nuclear activities. The new computer for this system will be on site before the end of this year and operational by May 31, 1981.

We have brought in outside, independent consultants to review certain areas of our operation and identify our weak and problem areas. Areas that have received this review include Health Physics, Training, Quality Assurance and Quality Control. Specific action programs have been initiated as a result of each of these reviews.

We have increased our audits and inspections of the ANO Security System and have authorized additional I&C Technicians who will be dedicated to supporting the Security System. Until we can fill our authorized I&C positions, we have obtained the services of a vendor to provide I&C Technicians to provide the necessary support.



November 12, 1980

We have also increased the use of special audits by the Corporate Safety Review Committee to provide detailed investigation of deficient areas of ANO operation.

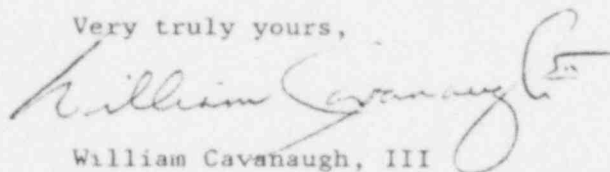
As we stated in our August 13, 1980 letter to Mr. Seyfrit, various factors impeded our progress toward our stated goal of meeting regulatory commitments and developing a quality nuclear training program. Some of these factors included staffing problems, prolonged startup of Unit 2, the abnormal amount of unscheduled lengthy outages and the continual drain on available manpower caused by an increasing number of new regulatory requirements and post TMI activities. A combination of these factors prevented us from meeting the schedules we had committed to NRC and we were remiss in failing to notify the NRC of these delays and requesting appropriate extension. We have improved our system for tracking our commitment dates and we have placed increased emphasis on timely notification of the NRC of any delays in these dates.

AP&L is deeply committed to the safe, efficient operation of its nuclear units. In order to ensure this, we are dedicated to providing the tools and resources necessary to adequately manage and control our activities. I believe that previously identified programs are a positive step in that direction and that the level of management attention focused on ANO will ensure a continuing program of identification and correction of weakness and problem areas.

We sincerely hope that this letter provides a clear and complete overview of the actions we have taken and are continuing to take to upgrade the level and quality of our management controls of licensed activities at ANO. If you have any additional questions or concerns, we would be more than willing to discuss them with you.

Enclosed is a check in the amount of \$21,500 as requested.

Very truly yours,



William Cavanaugh, III

WC:GAC:nak  
shy

Attachments

cc: 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



2-0332  
0132

ARKANSAS POWER & LIGHT COMPANY  
POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4422  
August 13, 1980

WILLIAM CAVANAUGH III  
Vice President  
Generation & Construction

1-080-10/2-080-10

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

Dear Mr. Seyfrit:

On Monday, August 11, 1980, representatives of AP&L met with you and members of your staff for the purpose of AP&L presenting to NRC the current status of AP&L's nuclear training program. This presentation included actions completed, projects underway and long term projects and goals. The presentation also was intended to respond to Mr. Gagliardo's findings and comments made after an NRC inspection on July 18, 1980.

The purpose of this letter is to document that presentation and AP&L management's position regarding its nuclear training program. Attached to this letter are the presentations regarding: operator training; training records; on-the-job training; general employee training; systems training; fire brigade training; and supervisory/professional/technical training.

As stated in the meeting, AP&L management is strongly committed to having a quality nuclear training program which exceeds regulatory requirements. Since the accident at Three Mile Island, AP&L has been evaluating its nuclear training program as part of its Three Mile Island response program. Our evaluation development programs and changes - quality nuclear training program w reliable operation of Arkansas Nuc changes and programs are:

1. Position Task Analysis

As a result of AP&L's TMI recognized that effective upon and validated by Pos

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