



ARKANSAS POWER & LIGHT COMPANY  
POST OFFICE BOX 351 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000

May 8, 1981

ØCANØ581Ø2

Mr. G. L. Madsen, Chief  
Reactor Operations & Nuclear Support  
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  
50-313/80-08 and 50-368/81-07  
(File: 0232, 2-0232)

Gentlemen:

We have reviewed the Items of Noncompliance included in the subject reports. Attached is our response to the following "Notice of Violation".

Very truly yours,

*David C. Trimble*

David C. Trimble  
Manager, Licensing

DCT:GAC:s1

*804*  
cc: Mr. Victor Stello, Jr., Director  
Office of Inspection & Enforcement  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

8105270 409

STATE OF ARKANSAS     )  
                              ) S.S.  
COUNTY OF PULASKI    )

I, DAVID C. TRIMBLE, being duly sworn, subscribe to and say that I am the Manager of the Licensing Section, for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the foregoing Letter No. 0CAN058102 and know the contents thereof; and that to the best of my knowledge, information and belief the statements made in it are true.

David C Trimble  
DAVID C. TRIMBLE

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 8th day of May, 1981.

Henry J. Carter  
NOTARY PUBLIC

MY COMMISSION EXPIRES:

12/20/82

### NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of February 22 through March 21, 1981, and in accordance with the Interim Enforcement Policy 45 FR 66754 (October 7, 1980), the following violations were identified:

1. 10 CFR 20.401(b) states, in part, "Each licensee shall maintain records in the same units used in this part, showing the results of surveys required by 20.201(b). . . ."

10 CFR 20.201(b) states, "Each licensee shall make or cause to be made such surveys as may be necessary for him to comply with the regulations in this part."

Radiation Protection Procedure 1602.18, Smear Sampling, has been established by the licensee to partially implement the requirements of 10 CFR 20.201(b).

Step 6.0 in this procedure states, in part, "Monthly smears taken during the Reactor Auxiliary Building Survey will be counted for alpha radiation."

Contrary to the above, although the licensee maintains that the required alpha surveys were conducted for January 1981, the licensee was unable to retrieve a record of the alpha smears performed in the Unit No. 1 and Unit No. 2 Reactor Auxiliary Buildings for the month of January 1981.

This constitutes a Severity Level V Violation (Supplement IV.E.2) (313/8108-01; 368/8107-01).

#### RESPONSE:

Alpha surveys were conducted in January 1981, however, the survey results were misplaced and have not been located. Statements by Health Physics personnel performing the surveys attest to the fact that the surveys were conducted.

To prevent recurrence of this violation, Procedure 1602.68, "Control of Routine HP Operations", has been revised which establishes appropriate controls for performing radiation surveys and documenting survey results.

Procedure training will be completed by May 15, 1981, at which time full compliance will be achieved.

2. 10 CFR 20.203(c) requires that each high radiation area shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: CAUTION (or DANGER) HIGH RADIATION AREA.

10 CFR.202(b)(3) defines "High Radiation Area" as, "any area, accessible to personnel, in which there exists radiation originating in whole or in part within licensed material at such levels that a major portion of the body could receive in any one hour a dose in excess of 100 millirem."

Contrary to the above, on March 3, 1981, the inspector identified a high radiation area near the bottom of the "B" Core Flood Tank in the Unit No. 1 Reactor Building which was not posted as a high radiation area.

This constitutes a Severity Level IV Violation (Supplement IV.C.1) (313/8108-02).

RESPONSE:

Based on radiation surveys performed prior to March 3, 1981, the radiological posting in the "B" Core Flood Tank area was downgraded to a "radiation area". During the filling of the reactor coolant system an apparent crud buildup created a hotspot resulting in a high radiation area; however, the radiological posting was not upgraded until the high radiation area was identified by the inspector. Health Physics personnel surveyed and posted the area a "high radiation area".

To prevent recurrence of this violation, areas defined as fluctuating high radiation areas shall remain posted as a "high radiation area" unless otherwise approved by the Health Physics Supervisor.

Full compliance will be achieved by June 1, 1981.

3. Unit No. 2 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."

Plant procedure 2104.39, "HPSI System Operation", has been established in accordance with this Technical Specification.

Step 2.11.2 in Supplement I, "2P-89A Monthly Test", to procedure 2104.39 requires that service water flow to the 'A' High Pressure Safety Injection (HPSI) pump cooler be verified by opening a vent valve, 2SW-1067, on the service water discharge pipe from the cooler.

Contrary to the above, on February 4, 1981, step 2.11.2 in Supplement I to procedure 2104.39 was initialed as having been completed although Unit No. 2 vent valve, 2SW-1067, was later determined not to have been installed on that date.

This constitutes a Severity Level V Violation (Supplement I.E.) (368/8107-04).

RESPONSE:

Procedure 2104.39, HPSI System Operation, was revised on March 4, 1981. A personnel error resulted in a step being initialed as having been completed although it was later determined that valve 2SW-1067 had not been installed. Operations personnel have been instructed that procedure steps will not be initialed complete until actually performed. The operator has been counselled concerning this incident and the proper use of procedures.

Full compliance has been achieved.

4. Unit No. 2 Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented, and maintained covering . . . f. Fire Protection Program implementation."

Plant procedure 1053.01, "Control of Combustibles", has been established in accordance with this Technical Specification.

Step 6.2.2 and Attachment 2 of this procedure prohibit storage of combustibles in Zone 2073-DD, (access area, pump area, tank room, etc., Elevation 354) in the Unit No. 2 Auxiliary Building.

Contrary to the above, on February 24, 1981, two oxygen bottles and an acetylene bottle were stored on Elevation 354 in the Auxiliary Building.

This constitutes a Severity Level V Violation (Supplement I.E.) (368/8107-02).

RESPONSE:

The oxygen and acetylene bottles which were stored by contract personnel were removed from the affected area on February 24, 1981. To prevent further violations the affected contract personnel have been indoctrinated in the requirements for control of combustibles.

Full compliance has been achieved.

5. Unit No. 2 Technical Specification Table 4.3-4 requires that a monthly channel check be performed on Triaxial Time-History Accelerograph ACS-8002.

Contrary to the above, the inspector found that, although this instrument has been calibrated quarterly, no monthly channel checks were performed on ACS-8002 during the period of January 1980 through February 1981.

This constitutes a Severity Level IV Violation (Supplement I.D.2) (368/8107-03).

RESPONSE:

Due to a personnel error the surveillance procedure did not require a monthly channel check. The surveillance procedure was revised to require the monthly channel check and was performed on March 3, 1981. Full compliance has been achieved.