

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION IV

Report Nos. 50-313/81-14
50-368/81-12

License Nos. DPR-51
NPF-6

Licensee: Arkansas Power and Light Company
Post Office Box 551
Little Rock, Arkansas 72203

Facility Name: Arkansas Nuclear One (ANO), Units 1 and 2

Inspection at: ANO Site, Russellville, Arkansas

Inspection conducted: April 6-10, 1981

Inspectors: *L. E. Cummins* 4/27/81
J. E. Cummins, Reactor Inspector, Systems and
and Technical Section (paragraphs 1, 3, 4 and 7) Date

L. P. Jaudon 4/27/81
J. P. Jaudon, Reactor Inspector, Systems
and Technical Section (paragraphs 1, 2, 5, 6, and 7) Date

Approved: *R. E. Hall* 4/27/81
R. E. Hall, Chief, Systems and Technical Section Date

Inspection Summary:

Inspection Conducted on April 6-10, 1981 (Report Nos. 50-313/81-14; 50-368/81-12)

Areas Inspected: Routine, unannounced inspection of follow up on previously identified item, organization and administration, nonroutine reporting program and surveillance. The inspection involved 63 inspector-hours by two NRC inspectors.

Results: Within the four areas inspected, no violations or deviations were identified.

DETAILS1. Persons Contacted

- *J. P. O'Hanlon, General Manager
- *J. Albers, Planning and Scheduling Supervisor
- *T. H. Cogburn, Plant Analysis Superintendent
- C. Cole, Planning and Scheduling Coordinator
- *E. Ewing, Plant Engineering Superintendent
- *L. W. Humphrey, Administrative Manager
- *J. McWilliams, Operations Superintendent
- G. H. Miller, Engineering and Technical Support Manager
- R. Roderick, Human Resources Supervisor
- *E. L. Sanders, Maintenance Manager
- *L. Schempp, Manager Nuclear Quality Control

The NRC inspectors also contacted other plant personnel including reactor operators, maintenance men, electricians, technicians, and administrative personnel.

*Denotes attendance at the exit interview.

2. Licensee Action on Previous Inspection Findings

(Open) Unresolved (313/8016-03; 368/8016-03). Problems with control of documents (i.e., drawings). This item was previously unresolved because the licensee, in the process of issuing revised procedures for the control of documents, had cancelled the procedure which contained specific guidance for the control of drawings before the replacement procedure was issued. At the time of the original inspection, the NRC inspector also had found four discrepancies with equipment index lists, which the licensee controlled as drawings.

During this inspection, the NRC inspector found that the licensee's Procedure 1013.10, Revision 2 (February 2, 1981), "Drawing Control and Distribution," was now in effect. Review of Procedure 1013.10 revealed that it contained specific directions to control the issuance of revised drawings. In summary, this licensee procedure assigned responsibility for insertion of revised drawings into controlled sets of drawings to personnel assigned to the Drawing Control Section. The procedure also required that, when a revised drawing was entered into a controlled set of the drawings, the superseded material was to be removed. The NRC inspector had no further questions concerning this procedure.

The NRC inspector found that the licensee had five outstanding Nonconformance Reports (NCRs) (No. 81-083-0, 81-084-0, 81-085-0, 81-086-0, and 81-087-0) concerning the failure of drawing control personnel to enter

changes in various index lists. These NCRs were initiated by Document Control against the holders of specific index lists because the holder was unable to produce the index list for change entry. The NRC inspector was informed by licensee representatives that the licensee had reduced the number of copies of controlled index lists in an effort to provide accountability and control. This item remains unresolved pending review of the licensee's action to establish and to maintain control of drawings.

3. Organization and Administration (Units 1 and 2)

The NRC inspector reviewed the licensee's on-site and off-site organizations to verify conformance with the requirements of the Technical Specifications (Section 6, Administrative Controls). The scope of this review included personnel qualifications, personnel responsibility and authority, shift crew composition, and Plant Safety Committee and Safety Review Committee membership.

No violations or deviations were identified.

4. Nonroutine Reporting Program

The NRC inspector reviewed the licensee's system for tracking and reporting nonroutine occurrences internally and to the NRC. The scope of this review included administrative controls and personnel responsibility for reviewing, responding to, and reporting nonroutine occurrences. The review also included the licensee's system for evaluating and tracking bulletins and circulars.

No violations or deviations were identified.

5. Surveillance

The NRC inspector reviewed the licensee's program for surveillance and for In-Service Testing (IST) of pumps and valves. The licensee's basic procedure for control of surveillance and the IST of pumps and valves was reviewed. This procedure was 1000.09, Revision 1 (January 14, 1981), "Surveillance Test Program Control." The NRC inspector found the following regarding the licensee's program for surveillance and IST of pumps and valves:

a. Scheduling of Surveillance

The licensee had assigned a planning/scheduling (P/S) coordinator to schedule and to monitor surveillance testing and pump and valve IST. The P/S coordinator maintained records of when periodic surveillances were completed, when the surveillances are next scheduled, and when the surveillance would exceed the Technical Specification time limit (i.e., either 25% past the required

completion date or 3.25 times the surveillance interval for three consecutive repetitions of the surveillance, whichever was most limiting.). The P/S coordinator prepared and sent to the responsible licensee department a notification to conduct the surveillance. After conduct of the surveillance, the responsible department returned the notification sheet to the P/S coordinator for update of scheduling records. Procedure 1000.09 required that each periodic surveillance with a frequency of weekly or greater be handled as described above. The NRC inspector found one instance in which it was not. The Technical Specification requirement for measuring boron concentration in the RWT is a weekly requirement, but the P/S coordinator did not maintain records of this surveillance. The NRC inspector found records that this surveillance was regularly conducted as required by Technical Specifications and that the results received a high degree of visibility since they were routinely included on a chemistry report, which was appended to the site Plan-of-the-Day. This is an unresolved item pending licensee action either to revise the procedural requirement of 1000.09 or to comply with Procedure 1000.09 as written (313/8114-01; 368/8112-01).

The NRC inspector checked the P/S coordinator's records for 34 other Technical Specification and pump and valve ISTs. One discrepancy was found in that a refueling surveillance for Unit 2 was not listed in the P/S coordinator's records. The P/S coordinator was aware of the requirement and showed the NRC inspector that the surveillance in question was scheduled (for the first time) on the integrated refueling work plan. The P/S coordinator corrected the records before the NRC inspector left the site. The NRC inspector had no further questions concerning the scheduling of surveillance tests or the IST of pumps and valves.

b. List of Surveillances

The NRC inspector found that the licensee had in draft form a procedure (1001.09, "Master Test Control List") which was referenced in Procedure 1000.09 and would supersede previous surveillance requirement lists. The NRC inspector noted that Procedure 1001.09 had to be issued in order to implement the surveillance test control program fully. The NRC inspector found that the licensee had recognized this requirement also, and had an outstanding nonconformance report (81-080-0) on this subject. The NRC inspector reviewed the draft Procedure 1001.09. Technical Specifications requirements for 28 surveillances selected at random were found to be correctly listed. However, when the NRC inspector checked four additional surveillance requirements from a recent amendment

(No. 50) to Unit 1 Technical Specifications, it was found that, for three of these surveillances, the requirement was listed in the draft procedure of 1001.09 but without reference to the Technical Specification paragraph and that the fourth new surveillance was not listed in the draft Procedure 1001.09.

Licensee management stated that this problem had been previously identified during review of Procedure 1001.09. The issuance of Procedure 1001.09 in complete form is an unresolved item (313/8114-02; 368/8112-02).

c. Surveillance Responsibility

The NRC inspector noted that licensee Procedure 1000.09 assigned Department Heads the responsibility to review new, revised or additional Technical Specifications for surveillance requirements which would be the responsibility of their respective departments. Department Heads are also responsible both to draft appropriate procedures and to notify the P/S coordinator of the new requirements. The NRC inspector found no instance in which a new or reviewed Technical Specification surveillance requirement had not been identified; however, the NRC inspector expressed concern to licensee management that the system for identifying new or revised surveillance requirements was fragmented and did not provide sufficient administrative checks to assure that a new surveillance requirement was identified and incorporated into the licensee's system.

d. Surveillance Procedures

The NRC inspector reviewed 30 procedures for the conduct of surveillance tests or pump and valve ISTs. As a result, the NRC inspector determined that the licensee's procedures provided prerequisites and preparations, sufficient instructions for the conduct of the test, acceptance criteria, and instructions (either in the step-by-step conduct of the test or in a special section) for return of the system to a normal configuration. Completed procedures were found to contain evidence of supervisory review.

There were no violations or deviations identified in this area of the inspection.

6. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations, or deviations. Unresolved items disclosed during this inspection are:

Number

313/8114-01;
368/8112-01

Reason Unresolved

Discrepancy between licensee
Procedure 1000.09 and site
practice (paragraph 5.a).

313/8114-02;
368/8112-02

Issuance of licensee Procedure
1001.09 in complete form (para-
graph 5.b).

Additionally, a previously identified unresolved item was reviewed during this inspection. This item is:

Number

313/8016-03;
368/8016-03

Reason Unresolved

Licensee to issue procedure for
the control of drawings. Licensee
Procedure 1013.10 was found to
be in effect. Licensee to
correct problems with index list
distribution.

7. Exit Interview

An exit interview was conducted April 10, 1981, with those Arkansas Power and Light personnel denoted in paragraph 1 of this report. At this meeting, the scope of the inspection and the findings were summarized.