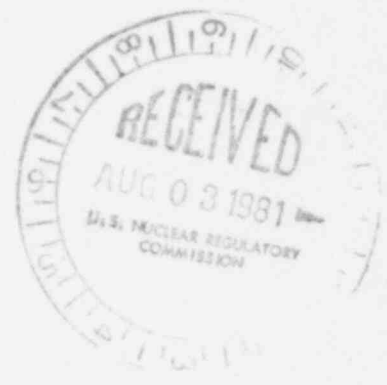


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In Reply Refer To:
RIV
Dockets: 50-313/81-06
50-368/81-05



Arkansas Power and Light Company
ATTN: Mr. William Cavanaugh III
Senior Vice President
Energy Supply
Post Office Box 551
Little Rock, Arkansas 72203

Gentlemen:

Thank you for your letter of May 19, 1981, in response to our letter and Notice of Violation dated April 24, 1981. As discussed by telephone with Mr. J. P. O'Hanlon and members of his staff and Mr. D. M. Hunnicutt and other members of the Region IV staff on July 2, 1981, we find that additional information is required regarding violations identified as B, C.3, and D in our Notice of Violation dated April 24, 1981.

With respect to Items C.3 and D, your application of a 25% allowable variance to the surveillance interval for those Technical Specification intervals specified as "not to exceed 18 months" is inappropriate. The surveillance interval allowance was defined for those surveillance intervals not having a prescribed tolerance; however, the words "not to exceed" define a maximum allowable interval and preclude extension using the 25% allowance. With respect to Violation D, the following correspondence indicates the intent of the Technical Specifications to restrict the surveillance interval as stated above:

- 1) Prior to Amendment 25 to the Technical Specifications, the periodicity of Technical Specification 4.11.1 stated, "At least once per refueling period (not to exceed 18 months)"
- 2) NRC letter dated June 7, 1976, discussed the need to change various Technical Specifications pertaining to surveillances (including 4.11.1) from a periodicity relating to "refueling period" to state, "at least once every 18 months" or equivalent. This letter also provided the change in wording for the present section of the ANO, Unit 1 Technical Specifications.
- 3) In response to this NRC letter, AP&L submitted the requested changes in a letter dated September 30, 1976. In this letter, the periodicity of Technical Specification 4.11.1 was changed to state, "once every 18 months"

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OFFICE	STS	STS	RP2	EIB	RPB	IES	DB-RIV
SURNAME	JRBoardman/nh	REHall	DMHunnicutt	WCSeidle	GLMadsen	JEGagliardo	JFCollins
DATE	7/19/81	7/10/81	7/10/81	7/10/81	7/10/81	7/10/81	7/10/81
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*Certified Orig.
C. Laticus*

- 4) NRC approved the AP&L changes proposed by the AP&L letter dated September 30, 1976, by an NRC letter dated June 1, 1977, as Amendment 25 to the Technical Specifications, and stated in this letter, "During our review, we determined that modifications to the requested changes were necessary. These changes were discussed with and agreed to by your staff and have been incorporated." Approved Amendment 25 revised the periodicity of Technical Specification 4.11.1 from "once every 18 months . . ." as proposed by AP&L to read "at intervals not to exceed 18 months . . ." indicating that a +25% tolerance was not approved. This position has been confirmed in a discussion with the NRR Project Manager who indicated that the phrase, "not to exceed 18 months," would in all cases indicate a limiting condition without an extended tolerance.

With respect to Violation B, your response indicated that the unique design of the control room damper system makes the current test method sufficient to satisfy the requirements of Technical Specification 4.10.2. We will consider this item as an unresolved item until we have reviewed the specifics of your equipment and the details of your test procedure.

With respect to Items C.3 and D, you are requested to respond within 30 days of the date of this letter with a written statement amplifying the information in your previous letter of May 19, 1981, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Sincerely,

G. L. Madsen, Chief
Reactor Projects Branch

bcc to Document Mgt. Branch for dist.

bcc dist. by RIV

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G. Vissing, NRR
R. Martin, NRR
Arkansas State Dept. of Health