



Inter-Office  
Correspondence

December 18, 1989

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U. S. Nuclear Regulatory Commission  
Document Control Desk  
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Washington, D. C. 20555

SUBJECT: Arkansas Nuclear One - Units 1 and 2  
Docket Nos. 50-313/50-368  
License Nos. DPR-51 and NPF-6  
Response to Inspection Report  
50-313/89-32; 50-368/89-32

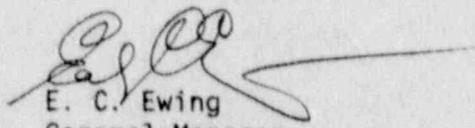
Gentlemen:

Pursuant to the provisions of 10CFR2.201, attached is the response to the violation identified in the subject inspection report.

In a discussion with Mr. Dwight Chamberlain of the Region IV NRC staff on December 11, 1989, a request was granted for a December 18, 1989, submittal date for this response. The overdue response was an administrative oversight due to new personnel and unfamiliarity with the tracking system. Current efforts are underway to review the tracking system and provide additional improvements.

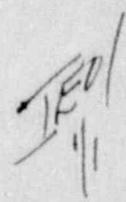
If further information is required, please contact Mr. J. J. Fisicaro at (501) 964-3228.

Very truly yours,

  
E. C. Ewing  
General Manager,  
Technical Support  
and Assessment

ECE/JDJ/sgw  
attachment

cc: Regional Administrator  
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Notice of Violation

10 CFR 50, Appendix B, Criteria XVI, "Corrective Action," states, in part, "Measures shall be established to assure conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Paragraph 16.2.2 of the Arkansas Power & Light Company's Quality Assurance Manual for Operations requires that cognizant supervisors review appropriate action to resolve the discrepancies and evaluate their safety significance.

Contrary to the above, the inspectors observed two examples of failure to promptly correct previously identified deficiencies. The examples are as follows:

1. On May 19, 1988, the licensee installed a temporary modification in the Unit 2 letdown system which replaced an ASME Class 2 relief valve with an unqualified valve of the same type. The temporary modification was performed to allow repair of the ASME valve. To date, no repairs have been made and the unqualified valve has remained in place for over 16 months.
2. On July 2, 1989, the licensee identified that the automatic reset function of the Unit 2 Channel "D" pressurizer low pressure trip function was inoperative. This equipment malfunction had been previously identified and a job request written; however, no mechanism to insure completed corrective action prior to the next plant shutdown had been established and no evaluation of safety significance had occurred.

This is a Severity Level IV violation. (Supplement I) (313;368/8932-01)

Response to the Violation

1. The reason for the violation:

Concerning the first example, the unqualified valve was installed in the letdown system in accordance with the Temporary Modification procedure to temporarily replace the leaking qualified valve. As required by the procedure, a 10CFR50.59 evaluation was performed which provided detailed justification for the installation until replacement parts for the qualified valve could be obtained. When the Temporary Modification (TM) was approved by the Plant Manager and the Plant Safety Committee, the "expected duration" of the TM was shown as 90 days, the maximum duration procedurally allowed for a TM without written justification and approval.

Valve internals were ordered for the qualified valve and the valve body was stored in the hot mechanics shop until parts were available for repair. Due to the long lead time required by the vendor to provide

ASME code qualified valve internals, the parts, ordered in May 1988, were not originally due onsite until February 1989. Prior to September 23, 1988, this arrival date was further extended by the vendor to June 30, 1989. Although the non-code valve could not be replaced until a plant shutdown following receipt of the necessary parts, and the parts could not be obtained from the vendor until June 1989, this justification was never included in the TM log book as required by the procedure and gave the appearance that no actions were being taken to resolve the nonconformance.

In July 1989, the valve body could not be located after the valve internals had arrived onsite. When a new valve could not be obtained from the vendor prior to the beginning of refueling outage 2R7 in September 1989, a spare qualified valve was located at another utility and was installed by November 8, 1989.

AP&L has determined the cause of the violation to be a weakness in the Temporary Modification (TM) administrative procedure. The approval form did not specify the requirement for justification if the Temporary Modification was expected to be needed for longer than 90 days. This would have provided proper inclusion and approval of the justification, but instead, the justification was required after the 90 day period and was never formally reviewed and approved.

With regard to the second example, a problem with the Unit 2 Channel "C" (rather than Channel "D") pressurizer low pressure trip bistable had been identified during a plant startup on June 26, 1989. At that time, the bypass failed to automatically reset before RCS pressure reached 500 psia. The channel was declared inoperable and appropriately bypassed within one hour as required by Technical Specifications. The instrumentation and control technician found that the bistable comparator card was bad and replaced it. He also noted that the coarse potentiometer for the bistable comparator card was degrading as he had some difficulty adjusting the setpoint; however, in his opinion the condition did not warrant immediate repair or replacement of the potentiometer. The technician submitted a job request on the potentiometer to the planning and scheduling group with the recommendation that the job be worked in Mode 5. No urgency was attached to the job request as neither the technician nor the operators believed that it affected the operability of the channel.

Shortly after reaching Mode 3, excessive RCS leakage was identified and the unit was brought to cold shutdown. After repairs, a startup was being conducted on July 2, 1989. During the startup, the Channel "C" pressurizer low pressure trip again did not automatically reset before

RCS pressure reached 500 psia. The channel was initially declared inoperable but was declared operable within an hour when the trip function automatically reset at 570 psia, as the trip function was then capable of performing its intended function.

The cause of the second example was the failure to recognize the degree of degradation of the potentiometer. The technician was not certain that the potentiometer had contributed to the first malfunction and there was no definite indication that operability of the trip function automatic reset was affected.

2. The corrective steps that have been taken:

The unqualified relief valve was replaced November 8, 1989, and qualified replacement valves are now on site.

Outstanding TMs have been reviewed on both units to ensure that appropriate justification for extended durations was included with the TM. Where such justification was not with the TM, actions have been initiated to provide justification. The necessary justifications are expected to be provided by January 31, 1990.

The coarse potentiometer was replaced September 27, 1989; the problem was identified as a defective connection. The fine potentiometer for this bistable was also replaced.

3. The corrective steps that will be taken to prevent recurrence:

The temporary modification procedure is being revised to include on the TM approval form a requirement to attach a separate form for justification of installations greater than 90 days. This form will be required when the TM is initially approved in cases where the installation is expected to be required beyond 90 days. This revision is expected to be implemented by January 31, 1990.

Storage bins will be installed in the hot mechanics shop to segregate items to be reused from radwaste to better control tagged equipment. This is scheduled to be completed by the end of the first quarter in 1990.

The generic concern regarding untimely corrective actions was the subject of a recent enforcement conference related to Inspection Report 50-313/89-35; 50-368/89-35, et al, and will be discussed in our response to those issues.

4. The date of full compliance:

AP&L has replaced the equipment for both examples given. Justifications for TMs of extended duration which are not currently in the file will be provided by January 31, 1990. The TM procedure is expected to be revised by January 31, 1990. The storage bins for the hot mechanics shop are scheduled to be completed by the end of the first quarter in 1990.