Arkansas Power & Light Company

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N. S. Carns Vice President Nuclear

March 16, 1990

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U. S. Nuclear Regulatory Commission Document Control Desk Mail Station P1-137 Washington, DC 20555

Subject: Arkansas Nuclear One - Units 1 & 2 Docket Nos. 50-313 and 50-368 License Nos. DPR-51 and NPF-6 Request for Voluntary Participation in NRC Regulatory Impact Study Generic Letter 90-01

Gentlemen:

In response to your correspondence of January 18, 1990 (ØCANØ19Ø2Ø), Generic Letter 90-01 "NRC Regulatory Impact Survey," AP&L is providing the enclosed information. Since AP&L does not keep detailed records of manhours spent on regulatory inspection activities, the enclosed information represents only estimates.

We support the NRC's efforts to assess the impact of regulatory inspections upon manpower resources and to utilize that assessment to improve the application of the regulatory process.

Should you have any questions, please do not hesitate to contact my office.

Sincerely,

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NSC/mb Attachments

9003290019 900316 PDR ADOCK 05000313 PDC

U. S. NRC Page 2 March 16, 1990

cc:

Mr. Robert Martin U. S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 1000 Arlington, TX 76011

NRC Senior Resident Inspector Arkansas Nuclear One - ANO-1 & 2 Number 1, Nuclear Plant Road Russellville, AR 72801

Mr. Thomas W. Alexion NRR Project Manager, Region IV/ANO-1 U. S. Nuclear Regulatory Commission NRR Mail Stop 13-D-18 One White Flint North 11555 Rockville Pike Rockville, Maryland 20852 .

Mr. Chester Poslusny NRR Project Manager, Region IV/ANO-2 U. S. Nuclear Regulatory Commission NRR Mail Stop 13-D-18 One White Flint North 11555 Rockville Pike Rockville, Maryland 20852

an<sup>a</sup> ana ana

| is t                                 | ed on actual experience over the past set<br>this activity conducted? <u>Approximately</u><br>pections per year.  |                                      |  |                        |                           |
|--------------------------------------|---|--------------------------------------|--|------------------------|---------------------------|
| Oper                                 | rations/Construction areas covered: <u>N</u>  | . A.                                 |  |                        |                           |
|                                      |   |                                      |  |                        |                           |
| Exte                                 | ent of the activity (how many people, f   | or how                               | long) <u>Te</u>  | am                     |                           |
| insp                                 | pections typically consist of 8 inspect   | ors on                               | site for a   | pproxi                 | mately                    |
|                                      |   |                                      |  |                        |                           |
| 1-2                                  | weeks; NRR project audits consist of 1  | -2 ins                               | pectors fo   | r one                  | week.                     |
| Appi                                 | weeks; NRR project audits consist of 1<br>roximate percentage of total time (on a<br>lowing managers must spend in direct in<br>in response to the activity described   | n annu<br>volvem                     | al basis)<br>ment before                                   | which                  | the                       |
| Appi                                 | roximate percentage of total time (on a<br>lowing managers must spend in direct in  | n annu<br>volvem                     | al basis)<br>ment before                                   | which                  | the<br>ng,                |
| Appi                                 | roximate percentage of total time (on a<br>lowing managers must spend in direct in<br>in response to the activity described   | n annu<br>volvem<br>in Ite           | al basis)<br>ment before                                   | which<br>, duri        | the<br>ng,<br><u>MANH</u> |
| Appr<br>fol<br>and                   | roximate percentage of total time (on a<br>lowing managers must spend in direct in<br>in response to the activity described   | n annu<br>volvem<br>in Ite           | al basis)<br>ent before<br>m #1.                           | which<br>, duri        | the<br>ng,<br><u>MANH</u> |
| Appr<br>fol<br>and<br>a.             | roximate percentage of total time (on a<br>lowing managers must spend in direct in<br>in response to the activity described<br>Plant Department Heads <u>6%</u> (n<br>Plant Manager <u>6%</u>   | n annu<br>volvem<br>in Ite<br>umber  | al basis)<br>ent before<br>m #1.                           | which<br>, duri<br>_4_ | the<br>ng,<br><u>MANH</u> |
| Appr<br>fol<br>and<br>a.<br>b.       | roximate percentage of total time (on a<br>lowing managers must spend in direct in<br>in response to the activity described<br>Plant Department Heads <u>6%</u> (n<br>Plant Manager <u>6%</u><br>Corporate Department Heads <u>*NA</u> (n | n annu<br>volvem<br>in Ite<br>number | al basis)<br>ent before<br>m #1.<br>involved)              | which<br>, duri<br>    | the<br>ng,<br><u>MANH</u> |
| Appr<br>fol<br>and<br>a.<br>b.<br>c. | roximate percentage of total time (on a<br>lowing managers must spend in direct in<br>in response to the activity described<br>Plant Department Heads <u>6%</u> (n<br>Plant Manager <u>6%</u><br>Corporate Department Heads <u>*NA</u> (n | n annu<br>volvem<br>in Ite<br>number | al basis)<br>ent before<br>m #1.<br>involved)<br>involved) | which<br>, duri<br>    | the                       |

\* All departments within Nuclear Operations were considered to be plant site personnel. AP&L defined "corporate" as outside Nuclear Operations.

**3** 

| Тур       | e of inspection, audit or evaluatio  | n: <u>Other</u>        | NRC Inspec                | tions        |            |
|-----------|--|------------------------|---------------------------|--------------|------------|
| Bas<br>is | ed on actual experience over the pa<br>this activity conducted? <u>The avera</u>                                 | st severa<br>ge is app | l years, ab<br>roximately | out ho<br>37 | w often    |
| ins       | pections per year (last 7 years).  |                        |                           |              |            |
| 0pe       | rations/Construction areas covered:  |                        |                           |              |            |
| of        | ent of the activity (how many peopl<br>NRC inspections consist of one or t<br>k. The NRC monthly Resident Inspec | wo inspec              | tors onsite               | for o        | ne         |
| ins       | pectors who usually perform continu  | ous inspe              | ctions of 4               | -6 wee       | <u>k</u> . |
| rep       | orting intervals.  |                        |                           |              |            |
| fol       | roximate percentage of total time (<br>lowing managers must spend in direc<br>in response to the activity descri | t involve              | ment before               |              |            |
|           |  |                        |                           |              | MANHOURS   |
| a.        | Plant Department Heads   | (number                | involved)                 | 6            | 624        |
| b.        | Plant Manager2%  |                        |                           |              | 42         |
| c.        | Corporate Department Heads <u>*NA</u>  | (number                | involved)                 | NA           | NA         |
| d.        | Corporate Vice Presidents  | (number                | involved)                 | 1            | 42         |
| e.        | Chief Nuclear Officer (See "d")  |                        |                           |              | NA         |
| f.        | Managers/Supervisors   | (number                | involved)                 | 24           | 6490       |
|           |  |                        |                           |              |            |

| isp                                 | e of inspection, audit or evaluatio  | n: EPA Co                                      | ompliance I                        | nspecti          | on   |
|-------------------------------------|--|--|------------------------------------|------------------|--|
| Bas                                 | ed on actual experience over the part<br>this activity conducted? <u>Approxima</u>   | st several<br>tely every                       | l years, ab<br>y 2 years.          | out how          | often  |
| Ope                                 | rations/Construction areas covered:  | NPDES pe                                       | ermit compl                        | iance,           |  |
| lan                                 | dfill, and air quality.  |  |                                    |                  |  |
|                                     | ent of the activity (how many people   | e, 101 110 <b>1</b>                            | ( 1011g) <u>-011</u>               | e mape           | <u>c.cor</u>   |
| App<br>fol                          | one day.<br>roximate percentage of total time (<br>lowing managers must spend in direct  | t involvem                                     | ment before                        |                  |  |
| App<br>fol                          | roximate percentage of total time (  | t involvem                                     | ment before                        | , durin          | g,   |
| App<br>fol                          | roximate percentage of total time (<br>lowing managers must spend in direct  | t involven<br>bed in Ite                       | ment before                        | , durin          |  |
| App<br>fol<br>and                   | roximate percentage of total time (<br>lowing managers must spend in direct<br>in response to the activity describ   | t involven<br>bed in Ite                       | ment before<br>em #1.              | , durin          | g,<br>MANHOURS   |
| App<br>fol<br>and<br>a.             | roximate percentage of total time (<br>lowing managers must spend in direct<br>in response to the activity describ<br>Plant Department Heads <u>&lt;1%</u>   | t involvem<br>bed in Ite<br>(number            | ment before<br>em #1.              | , durin          | g,<br>MANHOURS<br>   |
| App<br>fol<br>and<br>a.<br>b.       | roximate percentage of total time (d<br>lowing managers must spend in direct<br>in response to the activity describ<br>Plant Department Heads <u>&lt;1%</u><br>Plant Manager <u>&lt;1%</u>   | t involvem<br>bed in Ite<br>(number<br>(number | nent before<br>em #1.<br>involved) | , durin<br>1<br> | g,<br>MANHOURS<br>   |
| App<br>fol<br>and<br>a.<br>b.<br>c. | roximate percentage of total time (<br>lowing managers must spend in direct<br>in response to the activity describ<br>Plant Department Heads <u>&lt;1%</u><br>Plant Manager <u>&lt;1%</u><br>Corporate Department Heads <u>*NA</u> | t involvem<br>bed in Ite<br>(number<br>(number | <pre>involved) involved)</pre>     | , durin<br>1<br> | g,<br><u>MANHOURS</u><br><u>&lt;21</u><br><u>&lt;21</u><br><u>NA</u> |

1. Type of inspection, audit or evaluation: State and Local

Authorities--Arkansas State Pollution Control and Ecology.

- Based on actual experience over the past several years, about how often is this activity conducted? Approximately 2 inspections per year.
- Operations/Construction areas covered: <u>NPDES permit</u>, <u>landfill</u>, <u>and</u> air quality permit.
- Extent of the activity (how many people, for how long) <u>One inspector</u> for one day.
- 5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

|    |   |                             | MANNOURS |
|----|---|-----------------------------|----------|
| a. | Plant Department Heads <1%              | (number involved) <u>1</u>  | <21      |
| b. | Plant Manager <u>&lt;1%</u>             |                             |          |
| c. | Corporate Department Heads <u>*NA</u>   | (number involved) <u>NA</u> | NA       |
| d. | Corporate Vice Presidents <a>&lt;1%</a> | (number involved) 1         | <21      |
| e. | Chief Nuclear Officer (See "d")         |                             | NA       |
| f. | Managers/Supervisors3%                  | (number involved)           |          |

MANHOUDS

|                   | pe of inspection, audit or evaluation: <u>NRC-required Q</u>  | A audits           |                       |
|-------------------|---|--------------------|-----------------------|
| Base<br>is t      | ed on actual experience over the past several years, a this activity conducted? <u>Approximately 20 audits per</u>  | about how<br>year. | often                 |
|                   | erations/Construction areas covered: <u>As specified in 1</u><br>ecifications.  | [echnica]          |                       |
|                   | cent of the activity (how many people, for how long) <u>1</u><br>litors for 4 weeks.  | [hree              |                       |
|                   | proximate percentage of total time (on an annual basis)   | ubich t            |                       |
| foll              | lowing managers must spend in direct involvement befor<br>i in response to the activity described in Item #1.   |                    |                       |
| foll              | lowing managers must spend in direct involvement befor  | re, durin          |                       |
| foll              | lowing managers must spend in direct involvement befor  | re, durin          | g,                    |
| foll<br>and       | lowing managers must spend in direct involvement befor<br>i in response to the activity described in Item #1.   | re, durin          | g,<br>MANHOURS        |
| foll<br>and<br>a. | lowing managers must spend in direct involvement befor<br>i in response to the activity described in Item #1.<br>Plant Department Heads <u>2%</u> (number involved) | re, durin          | g,<br>MANHOURS<br>166 |

f. Managers/Supervisors <u>3%</u> (number involved) <u>24</u> 1498

NA

Chief Nuclear Officer (See "d")

e.

| Operations/Construction areas covered: <u>Operations</u> , <u>Maintenance</u> | is this ac | tivity conducted? <u>Appro</u> | e past several years, about how<br>ximately every 18 months |
|---|------------|--------------------------------|---|
| Technical Support Tunining Padistion Dustaction Chamictur                     | Operation  | /Construction areas cove       | red: <u>Operations</u> , Maintenance,                       |
| Technical Support, Training, Radiation Protection, Chemistry,                 | Technical  | Support, Training, Radia       | tion Protection, Chemistry,                                 |

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

MANHOURS Plant Department Heads 5% (number involved) 4 416 a. Plant Manager 2% 42 b. с. Corporate Department Heads \*NA (number involved) NA NA Corporate Vice Presidents 2% (number involved) 1 42 d. Chief Nuclear Officer (See "d") NA e. f. Managers/Supervisors 2% (number involved) 40 1664

- 1. Type of inspection, audit or evaluation: ANI insurers
- 2. Based on actual experience over the past several years, about how often is this activity conducted? <u>a) Resident Inspector conducts ongoing</u> <u>audit. b) Pump and valve program audited 4 times per year. c) ANSI</u> <u>N626 activity is audited 2 times per year. d) Annual and tri-annual</u> ANI fire protection audits.
- 3. Operations/Construction areas covered: <u>a) Daily audits involve all</u> <u>activities associated with ASME Section XI.</u> <u>b) Pump and valve program</u> <u>audits involve the activities and implementation of the program.</u> <u>c) ANSI N626 audits involve activities required by ASME Section XI.</u> <u>d) ANI fire protection inspections involve instrumentation, systems,</u> procedures, etc.
- 4. Extent of the activity (how many people, for how long) <u>a) Daily audit</u> by resident inspector. b) Pump and value audits are conducted by resident inspectors. c) ANSI N626 audits involve the resident inspectors. d) Fire protection inspections involve one ANSI inspector for approximately 3 days.
- Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

| a. | Plant Department Heads                  | (number | involved) | _9 | MANHOURS<br>378 |
|----|---|---------|-----------|----|-----------------|
| b. | Plant Manager2%                         |         |           |    | 42              |
| c. | Corporate Department Heads <u>*NA</u>   | (number | involved) | NA | NA              |
| d. | Corporate Vice Presidents <a>&lt;1%</a> | (number | involved) |    | <21             |
| e. | Chief Nuclear Officer (See "d")         |         |           |    | NA              |
| f. | Managers/Supervisors <u>5%</u>          | (number | involved) | 10 | 1040            |

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|                                     | e of inspection, audit or evaluatio  | n: <u>Self-</u>                              | assessments                                     | (SSFI)             |                                  |
|-------------------------------------|--|--|---|--------------------|----------------------------------|
| is                                  | ed on actual experience over the pa<br>this activity conducted? <u>One condu</u><br>the future.  |  |   |                    |                                  |
|                                     | rations/Construction areas covered:  | System                                       | specific  |                    |                                  |
|                                     | ent of the activity (how many people people for 4 weeks.   | e, for ho                                    | w long) <u>A</u>                                | pproxim            | ately                            |
| <u> </u>                            |  |  |   | 40,2249            |                                  |
| App<br>ful                          | roximate percentage of total time (<br>lowing managers must spend in direc<br>in response to the activity descri   | t involve                                    | ment before                                     | which t<br>, durin | he<br>g,                         |
| App<br>ful                          | roximate percentage of total time (<br>lowing managers must spend in direct  | t involve                                    | ment before                                     | , durin            | he<br>g,<br>MANHOURS             |
| App<br>ful                          | roximate percentage of total time (<br>lowing managers must spend in direct  | t involve<br>bed in Ito                      | ment before                                     | , durin            | g,                               |
| App<br>ful<br>and                   | roximate percentage of total time (<br>lowing managers must spend in direc<br>in response to the activity descri   | t involve<br>bed in Ito                      | ment before<br>em #1.                           | , durin            | g,<br>MANHOURS                   |
| App<br>ful<br>and<br>a.             | roximate percentage of total time (<br>lowing managers must spend in direct<br>in response to the activity descrip<br>Plant Department Heads <u>1%</u>   | t involve<br>bed in It<br>(number            | ment before<br>em #1.                           | , durin            | g,<br>MANHOURS<br>83             |
| App<br>ful<br>and<br>a.             | roximate percentage of total time (<br>lowing managers must spend in direct<br>in response to the activity descrip<br>Plant Department Heads <u>1%</u><br>Plant Manager <u>1%</u>  | t involve<br>bed in It<br>(number<br>(number | ment before<br>em #1.<br>involved)              | , durin<br>4       | g,<br>MANHOURS<br>83<br>21       |
| App<br>ful<br>and<br>a.<br>b.<br>c. | roximate percentage of total time (<br>lowing managers must spend in direct<br>in response to the activity describ<br>Plant Department Heads <u>1%</u><br>Plant Manager <u>1%</u><br>Corporate Department Heads <u>*NA</u> | t involve<br>bed in It<br>(number<br>(number | ment before<br>em #1.<br>involved)<br>involved) | , durin<br>4       | g,<br>MANHOURS<br>83<br>21<br>NA |

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| is                                  | ed on actual experience over the pas<br>this activity conducted? <u>Activity</u>  | has occu   | l years, ab<br>rred only a                                    | out ho<br>is a re        | ow ofte<br>sult            |
|-------------------------------------|---|--|---|--------------------------|----------------------------|
| -                                   | a complaint; no routine inspections.  |  | mont in dir   |                          |                            |
|                                     | rations/Construction areas covered:   |  | ment is dir   | ectly                    |                            |
| pro                                 | portional to severity of allegation.  | •••  |   |                          |                            |
|                                     |   |  |   | -                        |                            |
| Ext                                 | ent of the activity (how many people  | e, for how   | w long) Ac  | tivity                   | is                         |
| spe                                 | cific to the scope and severity of e  | each indi  | vidual alle   | ation                    | 1.                         |
| -                                   |   |  |   | 200101                   |                            |
|                                     |   |  |   | 1                        |                            |
| App<br>fol                          | roximate percentage of total time (c<br>lowing managers must spend in direct<br>in response to the activity describ   | on an anni<br>t involver                                     | ual basis)<br>ment before                                     | which                    | the<br>ng,                 |
| App<br>fol<br>and                   | roximate percentage of total time (o<br>lowing managers must spend in direct<br>in response to the activity describ   | on an ann<br>t involver<br>bed in Ite                        | ual basis)<br>ment before<br>em #1.                           | which<br>, duri          | the<br>ng,<br><u>MANHC</u> |
| App<br>fol<br>and<br>a.             | roximate percentage of total time (o<br>lowing managers must spend in direct<br>in response to the activity describ<br>Plant Department Heads2%   | on an ann<br>t involver<br>bed in Ite                        | ual basis)<br>ment before                                     | which<br>, duri          | the<br>ng,<br><u>MANHC</u> |
| App<br>fol<br>and                   | roximate percentage of total time (c<br>lowing managers must spend in direct<br>in response to the activity describ<br>Plant Department Heads2%<br>Plant Manager1%  | on an ann<br>t involver<br>bed in Ito<br>(number             | ual basis)<br>ment before<br>em #1.<br>involved)              | which<br>, duri<br>1     | the<br>ng,<br><u>MANHC</u> |
| App<br>fol<br>and<br>a.             | roximate percentage of total time (o<br>lowing managers must spend in direct<br>in response to the activity describ<br>Plant Department Heads2%   | on an ann<br>t involver<br>bed in Ito<br>(number             | ual basis)<br>ment before<br>em #1.                           | which<br>, duri<br>1     | the<br>ng,<br><u>MANHC</u> |
| App<br>fol<br>and<br>a.<br>b.       | roximate percentage of total time (c<br>lowing managers must spend in direct<br>in response to the activity describ<br>Plant Department Heads2%<br>Plant Manager1%  | on an anni<br>t involver<br>bed in Ite<br>(number<br>(number | ual basis)<br>ment before<br>em #1.<br>involved)              | which<br>, duri<br>1<br> | the<br>ng,<br><u>MANHC</u> |
| App<br>fol<br>and<br>a.<br>b.<br>c. | roximate percentage of total time (o<br>lowing managers must spend in direct<br>in response to the activity descrit<br>Plant Department Heads <u>2%</u><br>Plant Manager <u>1%</u><br>Corporate Department Heads <u>*NA</u> | on an anni<br>t involver<br>bed in Ite<br>(number<br>(number | ual basis)<br>ment before<br>em #1.<br>involved)<br>involved) | which<br>, duri<br>1<br> | the                        |

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|                        | e of inspection, audit or evaluat   | ion: <u>DOT</u>   |             |          |
|------------------------|---|---|-------------|----------|
| Bas<br>is              | ed on actual experience over the this activity conducted? <u>None</u>   | past several years  | s, about he | ow often |
| Ope                    | rations/Construction areas covere   | á: <u>None</u>  |             |          |
| Ext                    | ent of the activity (how many peo   | ple, for how long)  | None        |          |
|                        | roximate percentage of total time   |   |             |          |
| fol                    | roximate percentage of total time<br>lowing managers must spend in dir<br>in response to the activity desc  | ect involvement be  |             |          |
| fol                    | lowing managers must spend in dir   | ect involvement be  |             |          |
| fol<br>and             | lowing managers must spend in dir   | ect involvement be  | fore, duri  | ing,     |
| fol<br>and<br>a.       | lowing managers must spend in dir<br>in response to the activity desc   | ect involvement be<br>ribed in Item #1.                                     | fore, duri  | ing,     |
| fol                    | lowing managers must spend in dir<br>in response to the activity desc<br>Plant Department Heads   | ect involvement be<br>ribed in Item #1.<br>(number involv                   | ed) <u></u> | ing,     |
| fol<br>and<br>a.<br>b. | lowing managers must spend in dir<br>in response to the activity desc<br>Plant Department Heads<br>Plant Manager  | ect involvement be<br>ribed in Item #1.<br>(number involv<br>(number involv | ed) <u></u> | ing,     |
| fol<br>and<br>a.<br>b. | <pre>lowing managers must spend in dir<br/>in response to the activity desc<br/>Plant Department Heads<br/>Plant Manager<br/>Corporate Department Heads</pre> | ect involvement be<br>ribed in Item #1.<br>(number involv<br>(number involv | ed) <u></u> | ing,     |