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March 16, 1990

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U. S. Nuclear Regulatory Commission
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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,

NSC/mb
Attachments

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cc: Mr. Robert Martin
U. S. Nuclear Regulatory Commission
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Arkansas Nuclear One - ANO-1 & 2
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Mr. Chester Poslusny
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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: NRC Team Inspections
2. Based on actual experience over the past several years, about how often is this activity conducted? Approximately 3 team and 3 NRR project inspections per year.
3. Operations/Construction areas covered: N.A.
4. Extent of the activity (how many people, for how long) Team inspections typically consist of 8 inspectors onsite for approximately 1-2 weeks; NRR project audits consist of 1-2 inspectors for one week.
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.

| | | | <u>MANHOURS</u> |
|----|---------------------------------------|-----------------------------|-----------------|
| a. | Plant Department Heads <u>6%</u> | (number involved) <u>4</u> | <u>500</u> |
| b. | Plant Manager <u>6%</u> | | <u>125</u> |
| c. | Corporate Department Heads <u>*NA</u> | (number involved) <u>NA</u> | <u>NA</u> |
| d. | Corporate Vice Presidents <u>5%</u> | (number involved) <u>1</u> | <u>100</u> |
| e. | Chief Nuclear Officer (See "d") | | <u>NA</u> |
| f. | Managers/Supervisors <u>13%</u> | (number involved) <u>24</u> | <u>6248</u> |

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

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Other NRC Inspections

2. Based on actual experience over the past several years, about how often is this activity conducted? The average is approximately 37 inspections per year (last 7 years).

3. Operations/Construction areas covered: --

4. Extent of the activity (how many people, for how long) The majority of NRC inspections consist of one or two inspectors onsite for one week. The NRC monthly Resident Inspections consist of two resident inspectors who usually perform continuous inspections of 4-6 week reporting intervals.

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.

| | | | <u>MANHOURS</u> |
|----|--|-----------------------------|-----------------|
| a. | Plant Department Heads <u>5%</u> | (number involved) <u>6</u> | <u>624</u> |
| b. | Plant Manager <u>2%</u> | | <u>42</u> |
| c. | Corporate Department Heads <u>*NA</u> | (number involved) <u>NA</u> | <u>NA</u> |
| d. | Corporate Vice Presidents <u>2%</u> | (number involved) <u>1</u> | <u>42</u> |
| e. | Chief Nuclear Officer <u>(See "d")</u> | | <u>NA</u> |
| f. | Managers/Supervisors <u>13%</u> | (number involved) <u>24</u> | <u>6490</u> |

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: EPA Compliance Inspection

2. Based on actual experience over the past several years, about how often is this activity conducted? Approximately every 2 years.

3. Operations/Construction areas covered: NPDES permit compliance, landfill, and air quality.

4. Extent of the activity (how many people, for how long) One inspector 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.

| | | | <u>MANHOURS</u> |
|----|---|-----------------------------|-----------------|
| a. | Plant Department Heads <u><1%</u> | (number involved) <u>1</u> | <u><21</u> |
| b. | Plant Manager <u><1%</u> | | <u><21</u> |
| c. | Corporate Department Heads <u>*NA</u> | (number involved) <u>NA</u> | <u>NA</u> |
| d. | Corporate Vice Presidents <u><1%</u> | (number involved) <u>1</u> | <u><21</u> |
| e. | Chief Nuclear Officer <u>(See "d")</u> | | <u>NA</u> |
| f. | Managers/Supervisors <u>3%</u> | (number involved) <u>2</u> | <u>125</u> |

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: State and Local
Authorities--Arkansas State Pollution Control and Ecology.
2. Based on actual experience over the past several years, about how often is this activity conducted? Approximately 2 inspections per year.
3. Operations/Construction areas covered: NPDES permit, landfill, and air quality permit.
4. Extent of the activity (how many people, for how long) One inspector 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.

| | | | <u>MANHOURS</u> | |
|----|---|-----------------------------|-----------------|--|
| a. | Plant Department Heads <u><1%</u> | (number involved) <u>1</u> | <u><21</u> | |
| b. | Plant Manager <u><1%</u> | | <u><21</u> | |
| c. | Corporate Department Heads <u>*NA</u> | (number involved) <u>NA</u> | <u>NA</u> | |
| d. | Corporate Vice Presidents <u><1%</u> | (number involved) <u>1</u> | <u><21</u> | |
| e. | Chief Nuclear Officer <u>(See "d")</u> | | <u>NA</u> | |
| f. | Managers/Supervisors <u>3%</u> | (number involved) <u>2</u> | <u>125</u> | |

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: NRC-required QA audits

2. Based on actual experience over the past several years, about how often is this activity conducted? Approximately 20 audits per year.

3. Operations/Construction areas covered: As specified in Technical Specifications.

4. Extent of the activity (how many people, for how long) Three auditors for 4 weeks.

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.

| | | | <u>MANHOURS</u> |
|----|--|------------------------------|-----------------|
| a. | Plant Department Heads <u>2%</u> | (number involved) <u>4</u> | <u>166</u> |
| b. | Plant Manager <u>2%</u> | | <u>42</u> |
| c. | Corporate Department Heads <u>*NA</u> | (number involved) <u>*NA</u> | <u>NA</u> |
| d. | Corporate Vice Presidents <u>1%</u> | (number involved) <u>1</u> | <u>21</u> |
| e. | Chief Nuclear Officer <u>(See "d")</u> | | <u>NA</u> |
| f. | Managers/Supervisors <u>3%</u> | (number involved) <u>24</u> | <u>1498</u> |

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: INPO evaluations

2. Based on actual experience over the past several years, about how often is this activity conducted? Approximately every 18 months

3. Operations/Construction areas covered: Operations, Maintenance, Technical Support, Training, Radiation Protection, Chemistry, Operations Experience Review, Emergency Preparedness.

4. Extent of the activity (how many people, for how long) Approximately 15 evaluators for 2 weeks per evaluation.

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.

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

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NRC Regulatory Impact Survey
Questionnaire Sheet

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? a) Resident Inspector conducts ongoing audit. b) Pump and valve program audited 4 times per year. c) ANSI N626 activity is audited 2 times per year. d) Annual and tri-annual ANI fire protection audits.
3. Operations/Construction areas covered: a) Daily audits involve all activities associated with ASME Section XI. b) Pump and valve program audits involve the activities and implementation of the program. c) ANSI N626 audits involve activities required by ASME Section XI. d) ANI fire protection inspections involve instrumentation, systems, procedures, etc.
4. Extent of the activity (how many people, for how long) a) Daily audit 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.
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 |
|----|---|-----------------------------|---------------|
| a. | Plant Department Heads <u>2%</u> | (number involved) <u>9</u> | <u>378</u> |
| b. | Plant Manager <u>2%</u> | | <u>42</u> |
| c. | Corporate Department Heads <u>*NA</u> | (number involved) <u>NA</u> | <u>NA</u> |
| d. | Corporate Vice Presidents <u><1%</u> | (number involved) <u>1</u> | <u><21</u> |
| e. | Chief Nuclear Officer <u>(See "d")</u> | | <u>NA</u> |
| f. | Managers/Supervisors <u>5%</u> | (number involved) <u>10</u> | <u>1040</u> |

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Self-assessments (SSFI)

2. Based on actual experience over the past several years, about how often is this activity conducted? One conducted in 1989; two planned yearly in the future.

3. Operations/Construction areas covered: System specific

4. Extent of the activity (how many people, for how long) Approximately 13 people for 4 weeks.

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.

| | | | <u>MANHOURS</u> |
|----|---|-----------------------------|-----------------|
| a. | Plant Department Heads <u>1%</u> | (number involved) <u>4</u> | <u>83</u> |
| b. | Plant Manager <u>1%</u> | | <u>21</u> |
| c. | Corporate Department Heads <u>*NA</u> | (number involved) <u>NA</u> | <u>NA</u> |
| d. | Corporate Vice Presidents <u><1%</u> | (number involved) <u>1</u> | <u><21</u> |
| e. | Chief Nuclear Officer <u>(See "d")</u> | | <u>NA</u> |
| f. | Managers/Supervisors <u>2%</u> | (number involved) <u>24</u> | <u>998</u> |

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: OSHA

2. Based on actual experience over the past several years, about how often is this activity conducted? Activity has occurred only as a result of a complaint; no routine inspections.

3. Operations/Construction areas covered: Involvement is directly proportional to severity of allegation.

4. Extent of the activity (how many people, for how long) Activity is specific to the scope and severity of each individual allegation.

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.

| | | | <u>MANHOURS</u> |
|----|---|-----------------------------|-----------------|
| a. | Plant Department Heads <u>2%</u> | (number involved) <u>1</u> | <u>42</u> |
| b. | Plant Manager <u>1%</u> | | <u>21</u> |
| c. | Corporate Department Heads <u>*NA</u> | (number involved) <u>NA</u> | <u>NA</u> |
| d. | Corporate Vice Presidents <u><1%</u> | (number involved) <u>1</u> | <u><21</u> |
| e. | Chief Nuclear Officer <u>(See "d")</u> | | <u>NA</u> |
| f. | Managers/Supervisors <u>8%</u> | (number involved) <u>1</u> | <u>166</u> |

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: DOT

2. Based on actual experience over the past several years, about how often is this activity conducted? None

3. Operations/Construction areas covered: None

4. Extent of the activity (how many people, for how long) None

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.

| | | | <u>MANHOURS</u> |
|----|--------------------------------------|-----------------------------|-----------------|
| a. | Plant Department Heads <u>--</u> | (number involved) <u>--</u> | <u>--</u> |
| b. | Plant Manager <u>--</u> | | <u>--</u> |
| c. | Corporate Department Heads <u>--</u> | (number involved) <u>--</u> | <u>--</u> |
| d. | Corporate Vice Presidents <u>--</u> | (number involved) <u>--</u> | <u>--</u> |
| e. | Chief Nuclear Officer (See "d") | | <u>--</u> |
| f. | Managers/Supervisors <u>--</u> | (number involved) <u>--</u> | <u>--</u> |