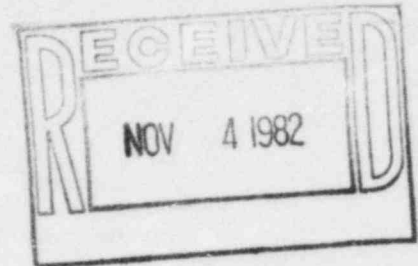




ARKANSAS POWER & LIGHT COMPANY  
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November 1, 1982



ØCAN1182Ø2

Mr. John T. Collins  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

SUBJECT: Arkansas Nuclear One - Units 1 and 2  
Docket Nos. 50-313 and 50-368  
License Nos. DPR-51 and NPF-6  
Partial Response to Emergency Planning  
Inspection Report 50-313/82-11 and  
50-368/82-09

Gentlemen:

Following a review of those open items in NRC's letter (ØCNAØ98215) dated September 28, 1982, which you requested a schedule for completion be submitted within 10 days after receipt of NRC's letter (ØCNA1Ø8216 received in this office October 21, 1982) dated October 19, 1982, the attached is provided.

Very truly yours,

John R. Marshall  
Manager, Licensing

JRM:DEJ:sc

Attachment

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PDR ADOCK 05000313  
PDR

## ATTACHMENT

The following Group A and B open items identify those areas of AP&L's emergency response capability in which AP&L agrees to take corrective action on before the 1983 exercise. Appropriate action to resolve each of these items will be taken by February 21, 1983. The Group B open items identified below will be addressed in the 1983 Emergency Preparedness training program. A summary of the action taken to resolve the Group A items will be submitted to the NRC by March 15, 1983.

Group A	313/8211-03	313/8211-26	313/8211-27
	368/8209-03	368/8209-26	368/8209-27
	313/8211-28	313/8211-40	313/8211-47
	368/8209-28	368/8209-40	368/8209-47
Group B	313/8211-16	313/8211-17	313/8211-80
	368/8209-16	368/8209-17	368/8209-80
	313/8211-83	313/8211-81	
	368/8209-83	368/8209-81	

The following Group C open items will require further evaluation by AP&L before action can be taken. A summary of the evaluation performed for each of these items and a schedule for corrective action, if necessary, will be provided to the NRC by January 17, 1983.

Group C	313/8211-09	313/8211-10	313/8211-14
	368/8209-09	368/8209-10	368/8209-14
	313/8211-19	313/8211-23	313/8211-30
	368/8209-19	368/8209-23	368/8209-30
	313/8211-32	313/8211-48	313/8211-52
	368/8209-32	368/8209-48	368/8209-52
	313/8211-54	313/8211-55	313/8211-58
	368/3209-54	368/8209-55	368/8209-58
	313/8211-73	368/8209-75	313/8211-77
	368/8209-73	368/8209-75	368/8209-77

The following Group D open items and the open items you identified as recommendations to the scenario committee for the development of the 1983 Emergency Preparedness Exercise Scenario, will be forwarded to the scenario committee for their consideration. The results of the scenario committee's evaluation will be reflected in the 1983 Emergency Preparedness Exercise Scenario.

Group D	313/8211-49	313/8211-79	313/8211-86
	368/8209-49	368/8209-79	368/8209-86

The remaining open items identified in your October 19, 1982 letter to which you requested a 10 day response, require specific responses. These responses are provided below.

Open Item 21: Meteorological information was not available for the TSC personnel to use in their dose calculations. (313/8211-21; 368/8209-21)

Response: This open item does not reflect circumstances which occurred in the TSC during the 1982 Emergency Preparedness Exercise. Meteorological information is available to the individual performing offsite dose calculation in the TSC through phone contact with the control room. This means existed and was utilized during the 1982 Emergency Preparedness Exercise.

Open Item 29: The habitability of the TSC did not meet the criteria of NUREG-0696 in that ventilation, filtration, and isolation capability was not provided. (313/8211-29; 368/8209-29)

Response: AP&L was provided exemption from the habitability criteria for the Onsite TSC in Mr. Darrell G. Eisenhut's letter to AP&L dated April 15, 1980. A discussion of AP&L's TSC and ECC concept along with a discussion of the protection factor for the ECC was provided in response to Issue 1 in AP&L's letter to Mr. K. V. Seyfrit dated September 18, 1981 (ØCANØ981Ø6).

Open Item 31: Continuous air monitoring, with audible and visual alarms, was not provided in the TSC proper. An air monitor was provided outside the TSC in the hallway, it was checked routinely, however, some checks on chart were not dated, timed, and initialed. (313/8211-31; 368/8209-31)

Response: The continuous air monitor (CAM) referenced in this item is a large instrument approximately 2' x 3' x 4' which when operating emits a considerable amount of noise due to its associated air pumping equipment. From a human factor's viewpoint and due to the limited space available in the TSC, AP&L does not believe this instrument should be placed within the TSC proper. The instrument now, as it was during the 1982 exercise, is located directly outside of the TSC. This area is fed from the same HVAC supply as the TSC and should be representative of the TSC environment. The CAM has both an audible alarm, which can be heard in the TSC as well as a visual alarm. The setpoint for this alarm is currently specified in procedure 1632.006. Based on these factors, AP&L believes it would be counterproductive to the overall emergency planning effort to locate the CAM in the TSC proper and therefore AP&L will continue its current practices.

To address the second concern of this item, regarding chart readings documentation, the 1983 Emergency Preparedness Training Program will address proper documentation practices for radiation detection equipment during an emergency.

Open Item 34: The inspectors noted that the Incident Response Director (IRD) spent an inordinate amount of time preparing for and giving press briefings. The inspector considered that, while there are no explicit regulatory requirements to preclude this action by the IRD, the IRD was removed from the mainstream of his vested command, control and decisionmaking function to a point where the inspectors questioned a number of actions which were apparently performed by other members of the EOF staff which were not delegated actions from the IRD. (313/8211-34; 368/8209-34)

Response: AP&L strongly believes, based on the experience gained from TMI, it is imperative that a single senior management, technically competent individual be responsible for all media releases and also participate in these releases. AP&L's total Emergency Response Organization is built around this concept. Amendment 4 to the Emergency Plan and Amendment 1 to the Contingency Plan were specifically made to provide a clear succession in the chain of command if the Incident Response Director (IRD) is not present. As delineated in these amendments, in the absence of the IRD the Assistant IRD assumes responsibility for the overall direction of AP&L's response to the incident. Based on these factors, AP&L plans to continue its current practices in this area.

Open Item 41: The EOF main decisionmaking rooms did not contain adequate space or provisions for face-to-face contact between the IRD and the NRC onsite representatives. (313/8211-41; 368/8209-41)

Response: The decisionmaking rooms you refer to make up only a small portion of the Emergency Control Center (ECC). These rooms were designed specifically to provide a central location from which the ERO would orchestrate the emergency response. The NRC is provided three offices across from this room in the ECC. It is in these offices and/or in conference rooms in the ECC that any ad hoc meetings and/or conferences between AP&L and the NRC should be held.

Open Item 45: The layout and size of the EOF main decisionmaking area was not adequate and would be even less adequate should the TSC become uninhabitable during an emergency. (313/8211-45; 368/8209-45)

Response: As stated in response to item 41, the main decisionmaking rooms make up only a small portion of the ECC and adequate space is available to accommodate this situation.

Open Item 56: The corporate Environmental Monitoring teams were dispatched to the ANO site prematurely in anticipation of upcoming events of the emergency. (313/8211-56; 368/8209-56)

Response: The Corporate Environmental Monitoring teams dispatch to the site when releases are in progress during an emergency or as appropriate (e.g. when in their opinion there is a potential for a release). At the time AP&L dispatched its Corporate Environmental Monitoring teams to the site, during the May 1982 Emergency Preparedness Exercise, the State had already dispatched their teams to the EPZ. AP&L believes it prudent to dispatch its monitoring teams when other agencies send their field monitoring teams out so that comparative data can be obtained and effective communications carried out.

Open Item 57: The licensee's plant public address system was not loud or clear enough, in high background noise areas, to be understood by the members of the fire team or others required to respond to an emergency announcement. (313/8211-57; 368/8209-57)

Response: The following modifications have been made to the plant paging system as a result of the 1982 Emergency Preparedness Exercise.

1. Minimum volume setting adjusted on Gaitronics system speakers (Individual volume adjustment cannot be made on PAX system).
2. PAX and Gaitronics paging systems combined such that access to entire paging system is via one paging number.
3. Gaitronics system has been added to Surveillance Master Procedure to ensure continued inspection.

AP&L believes these modifications will address the NRC's concerns.

Open Item 64: The medical kit did not contain adequate supplies (i.e., neck collar, inflatable splint, flashlight, forms for recording data). (313/8211-64; 368/8209-64)

Response: The contents of the medical kits have been evaluated by trained medical personnel and modified accordingly.

Open Item 82: There were breakdowns of the air sampling equipment and the transport vehicle. (313/8211-82; 368/8209-82)

Response: AP&L nor any other agency can guarantee that all of its equipment will work 100 percent of the time. However, to assure availability of emergency kit equipment operational tests are conducted monthly per procedure 1903.60, "Emergency Supplies and Equipment."

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The remaining open items which were identified in the NRC's September 28, 1982 letter to AP&L will be addressed following the next emergency exercise but no later than May 1, 1983.