



ARKANSAS POWER & LIGHT COMPANY  
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November 17, 1981

2CAN118101

Mr. G. L. Madsen, Chief  
Reactor Project Branch  
Office of Inspection & Enforcement  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

Subject: Arkansas Nuclear One - Unit 2  
Docket No. 50-368  
License No. NPF-6  
Response to Inspection Report  
50-368/81-24  
(File: 2-0232)

Gentlemen:

We have reviewed the Items of Noncompliance included in the subject report. Attached is our response to the "Notice of Violation" included in this report.

As discussed November 5, 1981, with Mr. Hunnicutt of Region IV this inspection report is being submitted late due to administrative reasons to acquire additional information to substantiate this response.

Very truly yours,

Donald A. Rueter  
Director, Tech. and Envir. Services

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cc: Mr. Richard C. DeYoung, Director  
Office of Inspection & Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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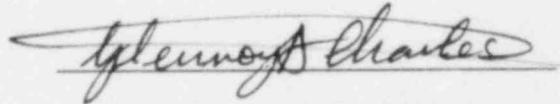
STATE OF ARKANSAS    )  
                                  )  
COUNTY OF PULASKI    )            SS

I, Donald A. Rueter, being duly sworn, subscribe to and say that I am Director, Technical and Environmental Services for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document numbered 2CAN118101 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.



Donald A. Rueter

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 19 day of November, 1981.



Notary Public

My Commission Expires:

12-20-82

## NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of July 22 - August 21, 1981, and in accordance with the Interim Enforcement Policy 45FR66754 (October 7, 1980), the following violations were identified:

1. Unit 2 Technical Specification 3.7.11 requires that all penetration fire barriers protecting safety-related areas be functional or a continuous fire watch must be established on at least one side of the affected penetration within one hour.

The penetration fire barrier for the Unit 2 North Engineered Safeguards Switchgear Room (which contains Engineered Safeguards electrical bus 2A3) was discovered to be nonfunctional by the NRC inspector on August 11, 1981, due to the fact that the removal of the ventilation exhaust fan from above the southwest corner of the room ceiling exposed an approximate 2 ft. x 2 ft. hole through the ceiling.

Contrary to the above, although the hole in the southwest corner of the ceiling of the Unit 2 North Engineered Safeguards Switchgear Room had existed for at least one day, the NRC inspector found that no fire watch was stationed at 1400 on August 11, 1981.  
368/81-24-01.

### RESPONSE:

AP&L does not agree that the subject penetration fire barrier was non-functional and therefore believes that full compliance with Technical Specification 3.7.11 has been maintained.

The ventilation fan had been removed from the exhaust ductwork for maintenance and did expose an open hole. However, the ductwork is attached to the floor, surrounds the open hole, extends approximately three feet above the floor and contains a fire damper which was and is fully functional.

A cover has been installed over the opening to prevent accumulation of debris. AP&L is presently in compliance.

2. Unit 2 Technical Specification Limiting Condition for Operation 3.8.2.5 states, "All containment penetration conductor overcurrent protective devices shown in Table 3.8-1 shall be OPERABLE."

Surveillance Requirement 4.8.2.5a requires that certain containment penetration conductor overcurrent protective devices shown in Table 3.8-1 be demonstrated OPERABLE every 18 months.

Technical Specification 4.0.3 states, in part:

"Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation..."

Technical Specification 6.9.1.9b requires, in part, that a written report be submitted to the Director of the Regional NRC office within thirty days describing the conditions leading to operation in a degraded mode permitted by a Limiting Condition for Operation.

Contrary to the above, the licensee did not submit to the Director of NRC Region IV within thirty days a written report describing the conditions discovered on June 26, 1981, that led to operation in a degraded mode permitted by limiting Condition for Operation 3.8.2.5. Specifically, on June 26, 1981, the licensee determined that Surveillance Requirement 4.8.2.5a had not been performed since September 12, 1978, and therefore, had not been performed in the specified time interval (every 18 months). In accordance with Technical Specification 4.0.3, the affected containment penetration conductor overcurrent protective devices then became technically inoperable until Surveillance Requirement 4.8.5a was successfully completed on June 27, 1981.

This constitutes a Severity Level IV Violation (Supplement I.D.4) (369/8124-02).

RESPONSE:

The apparent violation (368/8124-02) was assessed pursuant to Technical Specification 6.9.1.9b on the basis that failure to complete a surveillance test within the proper time interval signified operation in a degraded mode permitted by an LCO due to inoperable equipment and required a Licensee Event Report. This point of view requires an interpretation of Technical Specification 4.0.3, as stated above, such that equipment unequivocally becomes inoperable when the surveillance interval is exceeded.

AP&L does not agree with that interpretation and subsequent violation for failure to file an LER. In specific cases an LER may be appropriate with regard to the basis presented in Technical Specification 6.9.1.9.C as an administrative inadequacy.

The test was planned for completion during the 1981 refueling of Unit 2 but was not performed prior to the commencement of plant heatup due to an administrative error. A review of the testing history yielded a record of a job order that had been issued for test performance in 1980 which would have satisfied the surveillance requirement. However, documentation of the test results could not

be located and therefore, no credit was taken. Thus the time interval since the last documented test exceeded the specified surveillance interval. Upon discovery, plant mode changes were halted, and the test was completed promptly. All results were satisfactory.

Technical Specification 4.0.3 states that successful completion of Surveillance Requirements within the time interval definitely demonstrates compliance with operability requirements. This is true in relation to both regular schedules and following corrective maintenance. However, AP&L does not believe the equipment immediately becomes inoperable based upon expiration of the surveillance interval only. Further evaluation must be made.

Surveillance intervals are generally established with reference to having a program to detect degradation before problems occur. It is not expected that during surveillance testing, equipment would be routinely found in a condition which would prevent the fulfillment of the design function. In actual practice, if repeated failures are found, the surveillance interval is decreased appropriately to maintain equipment operable until a permanent solution is reached.

3. Unit 2 Technical Specification Table 3.3.6 requires that the control room ventilation intake duct monitor (2RITS-8750-1) be operable during all operating modes. The applicable action statement states:

"With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, within one hour initiate and maintain operation of the control room emergency ventilation system in the recirculation mode of operation."

Contrary to the above, on July 27, 1981, at 0750 hours, the NRC inspector found 2RITS-8750-1 inoperable (in the test mode with indication failed low) and the control room emergency ventilation system was not in the recirculation mode of operation. The operators on duty were not aware of the status of this instrument until it was pointed out by the inspector. Upon being informed, the plant operator placed the instrument in service. It was not known when the instrument had been taken out of service.

(This constitutes a Severity Level IV Violation (Supplement I.D.2) (368/8124-05).

RESPONSE:

When the condition was identified to the operators, the operability of the instrument was verified and the instrument was immediately returned to service.

Although monitoring of plant effluents was not involved in this particular case, operators were instructed on the importance of

ensuring operability of all radiation monitors. To assure future compliance, a revision has been made to the shift process monitor log to require a verification of operating switch position once each shift. Also, a review of the maintenance procedures associated with this instrument revealed that these procedures contain provisions for returning the equipment to its normal operating condition upon completion of the maintenance activity.

AP&L is presently in full compliance.