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May 7, 1990

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U. S. Nuclear Regulatory Commission
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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
50-313/90-05; 50-368/90-05

Gentlemen:

Pursuant to the provisions of 10CFR2.201, attached is the response to the violation regarding the failure to perform a Technical Specification surveillance on the containment personnel air lock within the required time interval.

Very truly yours,

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

ECE/DWB/sgw
Attachment
cc:

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Notice of Violation

Unit 2 Technical Specification 4.6.1.3, surveillance requirement for containment air locks, states, in part, that "Each containment air lock shall be demonstrated operable; a. After each opening, except when the air lock is being used for multiple entries, then at least once per 72 hours, by verifying seal leakage . . ." In addition, 10 CFR Part 50, Appendix J, Paragraph III.D.2(b)(iii) states, in part, that "Air locks opened during periods when containment integrity is required by plant's Technical Specifications shall be tested within three days after being opened."

Contrary to the above, on March 11, 1990, greater than 4 days had expired since the last opening of the air lock without the surveillance test being performed.

This is a Severity Level IV violation. (Supplement I)(368/9005-03)

Response to Violation 368/9005-03

(1) The reason for the violation

The reason for the missed surveillance on the containment personnel air lock was determined to be personnel error. The Shift Operations Supervisor and the Control Room licensed operators failed to recognize that a seal leakage test had not been performed. The key to the containment personnel air lock is under the strict administrative control of the Shift Operations Supervisor and issued by him. The Shift Operations Supervisor Key Control procedure specifically states that the Shift Operations Supervisor shall ensure that a seal leakage test is performed. Additionally, the requirement for the leakage test was annotated on a Safety System Status Board located in the Control Room. Although the requirement to perform the surveillance was documented, the Shift Operations Supervisors and licensed Control Room operators failed to be aware of the requirement.

(2) Corrective steps which have been taken and the results achieved:

The personnel involved received counselling regarding the incident. The event has been reviewed with each Shift Operations Supervisor. Operations personnel are being trained on the significance of surveillance requirements using this event as an example.

Additionally, a surveillance testing group has been established to manage the ANO Surveillance Test Program for both units. The supervisor position and one, of two, staff positions have been filled. An offer has been extended and verbally accepted for the second staff position. Procedure 1015.03B, "Unit Two Operations Logs", has been revised to require the performance of a daily check regarding the status of surveillance requirements which are not routinely tracked through an established surveillance tracking program. Also, the Safety System Status Board has been enlarged and rearranged to increase the visibility of the requirement to perform specific surveillances. A new section, "Administrative Controls", has been added to the status board which contains a subsection titled, "Surveillances Due." The "Hatch Leak Rate" surveillance is printed as an entry under this sub-section.

Since the implementation of the procedure revision to 1015.03B and the changes to the Safety System Status Board, no additional surveillances have been missed.

(3) Corrective steps which will be taken to prevent recurrence:

ANO Business Plan item C.1 had previously been initiated to address this issue. The action plan associated with item C.1 was reviewed in detail with the NRC at a meeting on April 24, 1990. As part of this action plan, an evaluation of the surveillance program is being conducted to identify problem areas and develop a plan which will provide resolution of the identified problems. The evaluation is scheduled to be completed by May 15, 1990.

(4) Date of full compliance

Full compliance with Technical Specification 4.6.1.3 surveillance requirement was achieved at 2210 hours on March 11, 1990, when the containment personnel air lock seal leakage test was satisfactorily completed with no discrepancies noted. Therefore, there were no safety concerns.

The surveillance program evaluation is scheduled to be completed by May 15, 1990. The surveillance test group positions will be fully staffed by May 15, 1990. The individual selected to fill the second staff position in the surveillance testing group is scheduled to report to ANO on, or before, May 21, 1990.

Full compliance will be achieved on May 21, 1990.