



Arkansas Power & Light Company

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June 5, 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  
Supplemental Response to Inspection  
Report 50-313/89-02; 50-368/89-02

Gentlemen:

As requested in Inspection Report 50-313/89-22; 50-368/89-22 dated September 14, 1989, the attached information provides additional actions regarding controls for processing identified Licensee Event Reports (LERs) to prevent further recurrence of Inspection Report violation 50-313/8902-02; 50-368/8902-02. Arkansas Power and Light Company has implemented several improvements regarding its Licensee Event Reporting (LER) process. Further assessment of the program has resulted in additional enhancements provided in the attachment. We will continue to review the LER process to determine if further improvements are necessary.

In addition, Attachment 2 provides revised completion dates for previous commitments provided in response to NRC Inspection Report 50-313/89-22; 50-368/89-22, Violation A. The new dates are consistent with the ANO Business Plan schedules regarding the Operations and Maintenance procedures upgrade programs.

If further information is required, please contact Mr. J. Fisicaro at (501) 964-3228.

Very truly yours,

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

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## LICENSEE EVENT REPORT IMPROVEMENTS

Arkansas Power & Light's (AP&L) April 7, 1989, response to Inspection Report 50-313/89-02 and 50-368/89-02 identified the following corrective actions: (1) addition of contractor staff as an interim measure to reduce overdue Licensee Event Reports (LERs) and provide permanent staffing responsible for preparation of LERs, (2) established a mechanism to keep management informed of the status of reportable events, and (3) established additional internal guidance to request appropriate extensions to submittal dates and also supplements if submitted LERs did not contain all the required information at the time of submittal.

In a subsequent July 6, 1989, letter documenting discussions in a June 16, 1989, NRC meeting with AP&L, the following additional actions were summarized:

- 1) The need for a more rigorous, up-front operability determination was identified. A new operability determination procedure was implemented and the shift operations supervisor now documents the basis of his operability determination.
- 2) The Plant Safety Committee LER reviews were moved to a postsubmittal review rather than presubmittal, to preclude unnecessary delays.
- 3) AP&L Management is made aware of Condition Report (CR) resolution progress by a periodically distributed status report on a) overdue action, b) open operability/reportability reports and c) assessment reports to the Safety Review Committee.
- 4) A biweekly report is issued to management listing outstanding LERs with respective due dates and expected submittal dates.
- 5) If AP&L is not able to meet the required reporting requirement, this fact will be communicated to the NRC along with AP&L's proposed schedule for submittal.

A review was performed of the LER process from the identification or discovery of an event or condition through the reportability determination and submittal of the LER to the NRC. The following additional program enhancements are being implemented to provide timely determinations of CR reportability and submittals of LERs pursuant to 10CFR50.73:

- 1) Reportable CRs are assigned to the responsible manager during the daily plant meeting to ensure information accurately and completely describes the event and root cause evaluations are assigned. This places ownership for root cause evaluations and identification of corrective actions.

- 2) Station Procedure 1000.104, "Condition Reporting and Corrective Actions," has been revised to enhance procedural controls for CR reportability determinations and for documentation of information required for reportability determination and LER preparation. The revision includes complete and timely measures to support LER submittals to the NRC. These measures are consistent with AP&L's philosophy of performing comprehensive reportability and operability determinations.
- 3) Initial root cause evaluations and proposed correction actions from the responsible departments are now being required within a timely period (i.e., approximately 14 days) from the occurrence of a reportable event or discovery of a potentially reportable condition.
- 4) Long lead times (e.g., 3 to 9 months) to obtain required information and perform reportability determinations will not be acceptable. It is recognized that some issues are complex and require a reasonable time to evaluate. However, immediate evaluation will be performed using available information within a reasonable period of time. Engineering judgement may be required to support reportability determination in a timely manner such that an LER can be submitted within 30 days following the discovery of a potentially reportable condition. This may result in certain reportable conditions submitted as LERs being retracted based on subsequent further evaluation.

Collectively, these measures have enhanced the LER process.

OPERATIONS AND MAINTENANCE PROCEDURES  
UPGRADE PROGRAM

In AP&L's response to 50-368/89-22, Violation A, dates for the completion of the Operations and Maintenance procedure upgrade programs were provided.

On March 14, 1990, the ANO Business Plan was submitted which provided revised completion dates for the Operations procedure upgrade program and the Maintenance procedure upgrade program.

Item C.11.a addressed the Operations upgrade program with a completion date of July 31, 1991. Item C.11.b addressed the Maintenance upgrade program with a completion date of November 30, 1990.