

ARKANSAS POWER & LIGHT COMPANY POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000 April 27, 1982

1CANØ48212

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Mr. W C. Seidle, Chief Reactor Project Branch #2 U. S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011

Y13100

SUBJECT: Arkansas Nuclear One - Unit 1 Docket No. 50-313 License No. DPR-51 Request for Additional Information Relative to Inspection Report 50-313/81-35 (File: 0232)

Gentlemen:

Attached is the additional information relative to Inspection Report 50-313/81-35 which you requested in your letter dated April 12, 1982, (1CNAØ482Ø5).

Very truly yours,

John R. Marshall Manager, Licensing

JRM: GAC: sc Attachment

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

> Mr. Norman M. Haller, Director Office of Management & Program Analysis U. S. Nuclear Regulatory Commission Washington, D. C. 20555

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NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of November 22 - December 31, 1981, and in accordance with the Interim Enforcement Policy 45 FR 66754 (October 7, 1980), the following violation was identified:

Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented, and maintained covering...a. The applicable procedures recommended in Appendix "A" Regulatory Guide 1.33."

Operating Procedure 1104.36, "Emergency Diesel Generator Operations," has been established in accordance with this Technical Specification.

Section 4.5 of OP 1104.36 requires that, if both diesels are run concurrently, one must be maintained running for at least three hours after the first diesel is shut down.

Contrary to the above, on December 12, 1981, both emergency diesel generators were run concurrently for operability testing, and the second diesel was run for only about 23 minutes after the first diesel was shut down.

This a Severity Level V Violation. (Supplement I.E.)(313/8135-01)

Response

This violation was noted through documentation of required diesel testing prior to removing a start-up transformer from service. At the time the violation was made known to Operations, subsequent diesel generator testing had produced a "staggered" test method, thus no immediate action was necessary to correct the three-hour minimum stagger following simultaneous diesel operation.

Investigation revealed that sufficient procedural cautions appear to be in place in the body of the diesel generator operating procedure 1104.36 in section 4.1 and in section 8.1.3, and in our degraded power procedure, 1202.05 by reference to section 8.0 of 1104.36.

This failure appeared to be directly related to the fact that no such precaution existed in test supplement for diesel generator testing, Supplement I of 1104.36. This test supplement is a "stand-alone" appendix which requires step-by-step signoff for permanent testing documentation. This supplement was being utilized nearly simultaneously for testing DG-1 and DG-2; since no specific step existed for staggering the shutdown of the diesels, it did not occur.

To prevent recurrence, Supplement I of 1104.36, "Emergency Diesel Generator Operation" was revised to include the three-hour stagger requirement in the event both diesels are run simultaneously. STATE OF ARKANSAS

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I, John R. Marshall, being duly sworn, subscribe to and say that I am Manager, Licensing for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document numbered 1CANØ48212 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.

SS

John R. Marshall

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 10 day of May, 1982.

Glenny & Charles

Notary Public

My Commission Expires:

12-20-82-