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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 and 50-368
License Nos. DPR-51 and NPF-6
Response to Inspection Report
50-313/93-10; 50-368/93-10

Gentlemen:

Pursuant to the provisions of 10CFR2.201, attached is the response to the violation identified during the inspection of activities associated with the failure to replace system relays on safety-related inverters.

Should you have questions or comments, please call Mr. Dwight Mims at 501-964-8601.

Very truly yours,

JWY/slp

Attachments

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NOTICE OF VIOLATION

During an NRC inspection conducted on November 14 through December 25, 1993, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

- A. Unit 1 Technical Specification 6.8.1.a requires, in part, that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, November 1972.

Regulatory Guide 1.33, Appendix A, recommended, in part, that preventive maintenance schedules be developed to specify replacement of parts that have a specific lifetime.

Procedure 1025.026, Revision 1, *Preparation, Review, and Approval of Preventive Maintenance Engineering Evaluations*, states that preventive maintenance engineering evaluations "establish the initial preventive maintenance activities and initial performance intervals" and that "The Preventive Maintenance program includes ...the replacement of limited life parts or components."

Preventive Maintenance Engineering Evaluation 107, Revision 4, dated April 27, 1992, *Inverters - 125 VDC to 120 VAC*, contained the following preventive maintenance requirement in Section 10: "Replace critical system relays on oscillator, sync, and status switch boards" once per refueling outage.

Contrary to the above, critical system relays on oscillator, sync, and status switch boards were not replaced during Refueling Outage 1R11 which ended October 18, 1993.

This is a Severity Level IV violation. (Supplement I) (313/9310-02)

Response to violation 313/9310-02

(1) Reason for the violation

On April 27, 1990, Revision 3 to Preventive Maintenance Engineering Evaluation (PMEE) 107 was issued. This revision incorporated recommendations from the manufacturer, Solid State Controls, which added requirements to replace critical system relays on oscillator, sync, and status switch boards in inverters once per refueling outage. During this time period the ANO Central Maintenance organization was responsible for developing and maintaining PMEE's and Preventive Maintenance (PM) tasks and procedures.

Internal action tracking items were issued within the Central Maintenance organization to implement into repetitive tasks the changes to PMEE 107 Revision 3. However, these additional internal action tracking items were not assigned due dates on the forms. When entered into the tracking system database, a due date of 09/09/99 was assigned. This due date used in the tracking system indicated a low priority item to be implemented as time allows. On April 27, 1992, Revision 4 to PMEE 107 was issued which made minor changes to the PMEE. An additional internal action tracking item was issued to incorporate the Revision 4 changes into tasks.

In April 1993, all open items in the internal action tracking system were closed in preparation for the transfer of responsibilities for the PM tasks and procedures from the Central Maintenance organization to the ANO Unit Maintenance organizations. The ANO Unit Maintenance organization personnel in each discipline were tasked to develop individual tracking systems. When the Central Maintenance organization internal action tracking database was closed, there was no transfer of information to the ANO Unit Maintenance organizations to ensure continued tracking.

The reason critical system relays on oscillator, synch, and status switch boards were not replaced during Refueling Outage 1R11 was that the PM controls in place at the time were deficient in assigning and tracking all actions.

Recently, another NRC Notice of Violation was received (50-313/93-09; 50-368/93-09 dated December 27, 1993) concerning the EDG speed sensing switch and the root cause of this event was determined to be a failure to adequately track and control the progress of the PM task planning. ANO also identified other condition reports written on the ANO PM program which indicate that additional program tracking and process improvements are necessary to ensure that PM tasks are identified, scheduled, and performed in a timely manner.

(2) Corrective steps taken and results achieved:

In response to the previous Notice of Violation issued in NRC Inspection Report 50-313/93-09; 50-368/93-09 concerning the EDG speed sensing switch, a review of PM, Mandatory Preventive Maintenance (MPM), and Environmental Qualification (EQ) tasks for safety-related (Q) components was performed to identify any tasks that may not have been approved and have no past accomplished dates, and those tasks which may have been approved, but have no assigned due dates. These tasks were reviewed to verify that component replacement tasks for limited life parts have been completed. Some schedule deviations were identified, but no component operability concerns were identified.

Procedure 1000.115, *Preventive Maintenance Program*, was revised to define responsibilities and requirements for tracking all unapproved PM/MPM/EQ tasks on ANO-1 and ANO-2. An implementation schedule was established.

A program for developing and implementing process improvements including tracking and scheduling of tasks has been initiated. This program includes evaluation of the program basis, the program processes, and actions for compliance. Additionally, this program also includes an implementation schedule.

(3) Corrective steps that will be taken to prevent further violations:

The requirements of PMEE 107 Revision 3 will be reviewed and implemented into repetitive tasks as appropriate. For ANO Unit 1 the requirements of PMEE-107 will be incorporated into appropriate tasks by March 30, 1994, and implemented during Refueling Outage 1R12 which is currently scheduled to begin on February 14, 1995. Appropriate ANO Unit 2 repetitive tasks will be finalized and implemented prior to the next refueling outage 2R10 which is currently scheduled to begin on March 12, 1994.

All corrective actions issued to revise PMEE's and issued to incorporate PMEE revisions into tasks will be reviewed to ensure actions are either complete or being appropriately tracked and scheduled. This action will be completed by March 12, 1994.

An audit of changes to the process for PMEE implementation into tasks will be completed and recommended corrective actions identified prior to December 31, 1994.

(4) Date when full compliance will be achieved

Full compliance for this event will be achieved when the requirements of PMEE 107 Revision 3 are incorporated into repetitive tasks. Compliance will be achieved for ANO Unit 1 by March 30, 1994, and for Unit 2 prior to Refueling Outage 2R10 which is currently scheduled to begin on March 12, 1994. Additionally, the enhancements to the PM program will be achieved when the revised program for managing and tracking PMs is implemented and PMEE implementation audits are completed on December 31, 1994.