

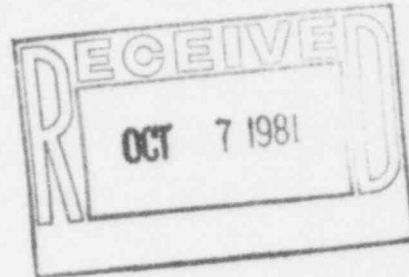


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ARKANSAS POWER & LIGHT COMPANY
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September 30, 1981

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Mr. K. V. Seyfrit, Director
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Drawing Control Progress
(File: 3300, 2-3300)

Gentlemen:

During the September 16, 1981 Systematic Assessment of Licensee Performance (SALP) held at Arkansas Nuclear One (ANO), AP&L committed to provide you a status report and a description of our plans in the area of drawing control. This letter is directed at fulfilling that commitment.

Our philosophy concerning drawing control is that it encompasses preparation, reproduction and distribution. We have identified several problems with the system presently in use at ANO. Namely, the timeliness of distribution, quality of reproduction, a large backlog of "pending" design changes and a long delay in the generation of as-built drawings.

Last fall we undertook studies aimed at identifying improvements in the drawing control program. These studies, completed this spring, were aimed at identifying those system changes required to accomplish our goal. This goal was to establish a drawing control program which would produce accurate, readable and timely revision of drawings in support of ANO and in full compliance with 10 CFR 50, Appendix B, Criteria III, V and VI.

When ANO-1 went into operation in 1974, there was no on-site Engineering organization. All Engineering functions were centralized in the Little Rock Corporate Offices some 70 miles from the plant. The original (mylar) drawings were turned over to AP&L by our architect-engineer and the drawing control function was located in Little Rock with the Engineering personnel. It was here that the necessary draftsmen and equipment were located to support ANO. This arrangement worked fairly well for the first few years. We had the systems and procedures in place to control drawings. However, we did not anticipate the large volume of

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modifications and design changes which would be required to support ANO. To further complicate matters, the turnover of ANO-2 drawings from our architectural engineers (A/E) in 1980 compounded our workload.

With the establishment of an on-site Engineering group to support ANO, we also established a method of producing field generated as-built drawings using sepias. We have found, however, that these systems were good only for the short-term and led to drawing quality problems and inefficiencies in production, particularly with the onset of the large volume of modifications.

The course of action developed is based on relocating the mylars to ANO and establishing the necessary resources at ANO to accomplish the intended goal. In addition, we are upgrading our method of drawing distribution to use aperture cards as the primary medium rather than blueines. In addition, all responsibility for the drawing control program is being consolidated under one organization - Plant Engineering.

We expect this new program to eliminate duplication of drafting, improve drawing quality by as-building directly on the mylar and speed drawing distribution through the use of aperture cards. Management support has been given to this plan and a target date for relocation of the mylars to ANO of January 1, 1982 has been set as described in our letter to you of June 11, 1981.

Additional resources required to implement this program have been identified. An addition to the Plant Engineering staff of five draftsmen and one clerk will be required to effectively control the drawings once the program is in effect. Because of limited space at the site, extensive renovation of on-site buildings is required. These renovations should be completed during the first part of December. The renovation will provide office space for Engineering, Drafting and Drawing Control personnel and space for storage and reproduction of drawings and aperture cards. Reproduction and drafting equipment have been ordered. The cost of the reproduction and the equipment to implement this part of the program is approximately \$291,000. Procedural changes required to establish this program are underway at this time and are expected to be complete by December 1.

Once the mylars are relocated to ANO, an extensive review process will be undertaken to ensure that the present plant as-built information is properly reflected on the mylar and to ensure that the quality of the mylars is adequate for plant use. Those drawings requiring revision or redrafting will be identified and prioritized to ensure that those drawings most frequently used by Operations and Maintenance personnel are updated in a timely manner. To accomplish this task we have determined that additional temporary clerical and drafting support are required. Three additional draftsmen and three additional clerks will be temporarily added to the staff to support this effort.

We have estimated that the revision of the majority of the drawings will be as-built onto the mylars by June 30, 1982. In the interim we have added contract Engineering personnel and temporary clerical and drafting personnel at ANO and in Little Rock to eliminate the backlog of as-built

drawing information and to improve the status of the mylars prior to turnover. The interim program began in November, 1980 and to date has cost approximately \$750,000.

In addition, interim steps have been taken to improve drawing quality for those drawings frequently used by Operations personnel. The equipment in use at our Little Rock office cannot utilize an ammonia process, consequently, the sepias produced are of a poor quality for P&ID's and scheme drawings. We are utilizing outside reproduction equipment with the ammonia process to improve drawing quality.

With regard to the timeliness of issuance of as-built information, we are evaluating the entire DCP closeout process as it exists under our present procedures. When review is complete, we will have identified those areas which can be improved to optimize the turn-around time with regard to issuance of as-builts while still ensuring a quality review of the DCP documentation. We will keep your resident inspectors advised of our progress in this regard.

The schedule we have established is extremely tight and contingent upon meeting the schedule for office space renovation and delivery of the necessary equipment in the required time frame. When completed, we expect the total cost of this program to be in excess of one million dollars. We also expect to have in effect a comprehensive and quality oriented drawing control program which is responsive to the operating needs of the plant.

Very truly yours,

David C. Trimble

David C. Trimble
Manager, Licensing

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