

OCT 1 1990

In Reply Refer To:  
Dockets: 50-313/90-19  
50-368/90-19

Entergy Operations, Inc.  
ATTN: Neil S. Carns, Vice President  
Operations, Arkansas Nuclear One  
P.O. Box 551  
Little Rock, Arkansas 72203

Gentlemen:

Thank you for your letter of September 7, 1990, in response to our letter and Notice of Violation dated August 10, 1990. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

Original Signed By

*Dwight D. Chamberlain*

Samuel J. Collins, Director  
Division of Reactor Projects

cc:  
Entergy Operations, Inc.  
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RIV:DRP/AA  
PHHarrel  
9/26/90

C:DRP/A  
TFWesterman  
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*DOC*  
D:DRP *fn*  
SJCcollins  
9/28/90

*IEO1*  
*11*

Entergy Operations, Inc.

-2-

Arkansas Nuclear One  
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Arkansas Nuclear One  
ATTN: Jerry Yelverton, Director  
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U.S. Nuclear Regulatory Commission  
ATTN: Senior Resident Inspector  
1 Nuclear Plant Road  
Russellville, Arkansas 72801

Entergy Operations, Inc.

-3-

U.S. Nuclear Regulatory Commission  
ATTN: Regional Administrator, Region IV  
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bcc to DMB (IE01)

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DRSS-FRPS

Lisa Shea, RM/ALF

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C. Poslusny, NRR Project Manager (MS: 13-D-18)

\*Resident Inspector

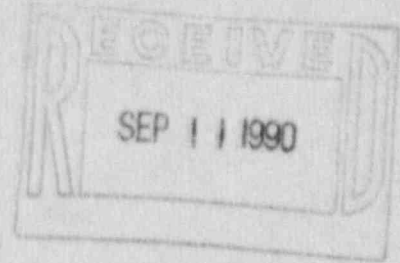
\*Section Chief (DRP/A)

\*RIV File

\*MIS System

\*Project Engineer (DRP/A)

DRS



September 7, 1990

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U. S. Nuclear Regulatory Commission  
Document Control Desk  
Mail Station P1-137  
Washington, D. C. 20555

SUBJECT: Arkansas Nuclear One - Units 1 and 2  
Docket No. 50-313/50-368  
License No. DPR-51 and NPF-6  
Response to Inspection Report  
50-313/90-19; 50-368/90-19

Gentlemen:

Pursuant to the provisions of 10CFR2.201, attached is the response to the violation concerning personnel errors which resulted in an incorrect procedure revision and caused the performance of an inadequate channel functional test on the Logarithmic Power Level Nuclear Instrumentation channels prior to a reactor startup. LER 50-368/90-015-00 dated July 30, 1990, also addresses this condition.

In accordance with the instructions provided in the subject inspection report, no written response to violation B (368/9019-02) was required.

Very truly yours,

E. C. Ewing  
General Manager,  
Assessment

ECE/DWB/sgw  
Attachment

cc: Regional Administrator  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

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AX

IC-90-269



Notice of Violation

A. Failure to Adequately Perform a TS Surveillance

Unit 2 TS 4.3.1.1.1, surveillance requirement for the reactor protection instrumentation, states that, "Each reactor protective instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations for the modes and at the frequencies shown in Table 4.3-1."

Item 3, "Logarithmic Power Level-High," in Table 4.3-1 states that a channel functional test is required prior to a startup.

Contrary to the above, on June 27, 1990, the inspector identified that an adequate channel functional test of the logarithmic power level was not performed prior to a plant startup in that the analog portion of the log power circuit was not tested.

This is a Severity Level IV violation. (Supplement I) (368/9019-01)

Response to Violation 368/9019-01

(1) Reason for the violation

The reason for this event was determined to be personnel errors associated with the plant procedure development, review and approval process. Approximately three months prior to this event a review of the test methods used to perform Log Power Level functional tests had concluded the channels were not being tested correctly (refer to LER 50-368/90-006-00). A Condition Report was written to document the identified deficiency and a corrective action plan was initiated to resolve the problem. As an interim measure, a temporary procedure change was made to the Plant Startup procedure which correctly identified the required testing procedures. (The correct testing procedures were performed prior to a reactor startup on March 7, 1990.) An action specifying the required procedure changes was assigned to the appropriate plant department to ensure the Plant Startup procedure was revised to permanently incorporate the necessary changes.

However, when the permanent procedure revision was developed one of the necessary testing procedures specified by the action item was not incorporated into the procedure. This error was not detected during the review and approval process. Due to a lack of attention to detail on the part of those personnel responsible for developing, independently reviewing and approving this procedure revision and closing the condition report action items, these personnel failed to recognize that the procedure revision did not appropriately address

the assigned action. As a contributing factor, an evaluation of what constitutes a satisfactory functional test was performed that did not clearly indicate which testing procedures were required to ensure compliance with Technical Specifications and appeared to be inconsistent with the action assigned to revise the Plant Startup procedure. Also, the procedure writer group assigned an internal action to revise the Plant Startup procedure which did not clearly communicate the action that was assigned in the Condition Reporting system. When the procedure revision was developed the written evaluation was used rather than the Condition Report assigned action which clearly identified the correct testing procedures.

The portion of the channels that was not adequately tested was from pre-amplifiers in containment, associated cables and control room indicators. Since this condition was identified after plant startup and the indicators responded properly it was determined that no further testing was required.

It should be noted that although a similar condition report was written within the last three (3) months, this particular instance was due to personnel error, not a procedural or programmatic deficiency. Had the required action of the initial condition report been incorporated properly, this condition would not have existed.

(2) Corrective steps taken and the results achieved:

A re-evaluation of the testing requirements for the Log Power channel functional test was performed. The I&C procedures have been revised to identify the required testing method. The Plant Startup procedure has also been revised to correctly identify the appropriate testing procedures which should be performed for Technical Specification compliance.

Additionally, the ANO Administrative procedure "Procedure Control" has been revised to require a review of all surveillance procedure revisions by the Supervisor, Surveillance Testing. ANO personnel responsible for initiating procedure changes have received additional training on the requirements for processing procedure changes (i.e., originator and independent reviewer's responsibilities).

The individuals involved in the revisions of the Plant Startup procedure have received counselling. Additionally, a memorandum was issued July 31, 1990, to Managers reemphasizing the need to ensure verification that the responses to actions assigned in Condition Reports are correctly completed prior to closing the action (i.e., ensuring the response agrees with the assigned action or deviations are properly dispositioned).

Both the Condition Reporting system and the procedure revision process were followed as required. The individuals involved made an error due to the assigned Condition Report action to revise the Plant Startup procedure not being clearly communicated in the procedure writer's group internal action assignment.

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

The ANO Business Plan has established a program to perform an evaluation of the ANO surveillances and improve the overall quality of the surveillance test program. Surveillance procedures will be reverified and revised as necessary to ensure the procedures consistently identify the surveillance requirements and document operability. The scheduled completion date for this activity is July 1, 1992.

(4) Date of full compliance:

Full compliance was achieved following the revision to the I&C procedures (approved by the Plant Safety Committee on June 22, 1990) and the Startup Procedure (approved by the Plant Safety Committee on July 17, 1990).