

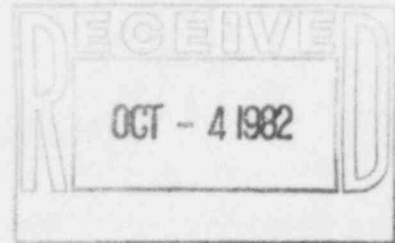


ARKANSAS POWER & LIGHT COMPANY

FIRST NATIONAL BUILDING/P.O. BOX 551/LITTLE ROCK, ARKANSAS 72203/(501) 371-4422

September 29, 1982

WILLIAM CAVANAUGH, III
Senior Vice President
Energy Supply



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Mr. John T. Collins
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

SUBJECT: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 51-313 & 50-368
License Nos. DPR-51 & NPF-6
Follow-up Actions on IE Bulletin
80-06
(File: 0232, 2-0232)

Gentlemen:

In our letter from Mr. John R. Marshall to Mr. W. C. Seidle of May 13, 1982 (ØCANØ582Ø7), we outlined various steps that AP&L was taking to improve its approach to the review and control of letters and commitments to the NRC. At that time we indicated that, among other things, we were developing a Regulatory Response Program, we had implemented a centralized commitment tracking system, and we were planning a special Safety Review Committee audit of the circumstances involving the IE Bulletin 80-06 matter. The Regulatory Response Program was issued for use on July 1, 1982, as scheduled, and development of supporting procedures has continued. We have also continued to use the centralized commitment tracking system with special emphasis on improving the data base in the system. The audit by the Safety Review Committee (SRC) was conducted as planned and the results have been reviewed by AP&L management.

In my review of the SRC audit report, I agreed with the conclusion and recommendations of the report but I also directed that certain interim measures be implemented on an expedited basis to further improve our control of responses and commitments to the NRC. I have also directed that a longer term program be initiated with the assistance of outside contractors to continue our improvement actions. In a meeting with you and other representatives of NRC and AP&L management on September 10, 1982, I outlined the interim and long term actions we have initiated in these areas.

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The following is a summary of the interim actions initiated by AP&L:

1. Development of procedures and guidelines supporting the Regulatory Response Program is being expedited with particular emphasis on those program tasks determined to be of the highest priority.
2. An engineer in the Licensing Section was designated on September 1, 1982, to monitor our centralized commitment tracking system (COMTRAC) on a daily basis to see that it is being properly updated. This assignment will continue until we are satisfied that COMTRAC is being properly maintained and controlled.
3. A program for verification of commitments was implemented on September 1, 1982. This effort, which utilizes ANO Special Projects, Quality Control, Quality Assurance and consultant personnel, provides for independent verification of commitments before they are closed and before letters are issued to NRC. The verification process will also be audited.
4. A unique identification system for design change packages that pertain to a commitment to the NRC is being developed.
5. A study to determine if there is an effective method for prioritizing responses to NRC actions according to nuclear safety significance has been initiated.

In addition to those interim actions, AP&L is proceeding with development of a Regulatory Response and Commitment Control Program to further improve our approach to review and control of letters and commitments to the NRC. This Program is intended to encompass and supersede the existing Regulatory Response Program mentioned above. We have outlined an initial approach to the development of this Program which we intend to follow at this time. We have structured the Program with sufficient flexibility so that it may be modified as we proceed to assure that we are addressing the root cause of any problems we identify in the areas covered by the Program. The following is a summary of the five phases we have identified at this time which represent our approach to the development of the program.

- A. (Phase 1) Define objectives and goals of the program through discussions with AP&L management personnel, review of the existing Regulatory Response Programs, and evaluation of existing procedures and systems. Develop recommended action plans for establishing a system for tracking commitments already implemented (i.e., passive commitment tracking) and for revising procedures at Arkansas Nuclear One (ANO) and the Little Rock General Office (LRGO) to incorporate appropriate provisions for controlling commitments. Develop methods for verification of actions taken on previous commitments. This phase will include evaluation of established working systems at other utilities for possible use by AP&L.

- B. (Phase 2) Review AP&L files for the period January 1, 1979 to present time to identify and tabulate all commitments made to the NRC. Prepare commitment packages that can be used for later verification and tracking.
- C. (Phase 3) Using commitment packages prepared in Phase 2, verify appropriate implementation at ANO or LRGO through review of documentation and installed systems and equipment using the methods established in Phase 1. This may involve statistical sampling of commitments with some groups of commitments receiving 100% verification due to safety implications or management decisions.
- D. (Phase 4) Develop and implement a system for tracking of commitments already completed (i.e., a passive commitment tracking system) using the approach identified in Phase 1. This system will supplement the active commitment tracking provided by our present centralized commitment tracking system.
- E. (Phase 5) Revise applicable procedures related to the control of design change packages, job orders, procedures, correspondence, commitment tracking, quality assurance, quality control and other activities using the approach defined in Phase 1 to incorporate appropriate provisions for controlling commitments.

Since we are now in the initial stages of development and implementation of this Program the above phases may be slightly altered as we proceed and refine our approach to the Program. I have endorsed the approach to this Program and have authorized the use of outside consultants to support its development in a timely manner. Our present goal is to complete all five phases of this Program within six months. While that is a very ambitious schedule, we feel it is appropriate to develop our permanent control mechanisms in that time frame to allow a phase out of interim actions. We will provide a status report on this Program to you by January 15, 1983 which will identify any noteworthy Program changes.

In order to provide added assurance that our actions (both interim and long term) are appropriate, we have initiated further reviews of these actions. In particular, the Safety Review Committee has reviewed the actions at recent meetings and will monitor progress of the action plans through review of the periodic status reports. An independent review of our interim actions has also been performed by an outside consultant who concluded that those actions were appropriate.

As a further check of our actions, we have contacted the Institute of Nuclear Power Operations (INPO) to arrange for an independent assessment of the results of Phase 1 of the Regulatory Response and Commitment Control Program as well as an independent assessment of the activities of our Plant Safety Committee and Safety Review Committee. The independent assessment of the committee activities will look at the meaningfulness of their reviews in assessing nuclear safety considerations from the proper perspective. We feel that this assessment is appropriate because of the

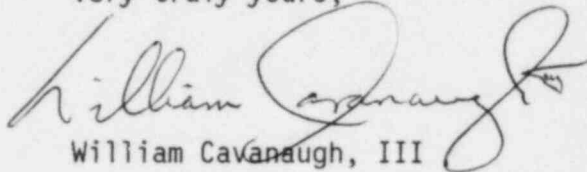
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important role that the committees have in our response to NRC requirements. INPO has also been requested to accelerate the schedule for their corporate evaluation of AP&L by one year so that it will be done in the spring of 1983.

On a related matter, we are evaluating approaches to providing an individual on site to provide independent oversight of plant activities. It is presently intended that such an individual would report to an appropriate position off site to assure independence from plant activities.

This summary of our action plans is provided to you at this time to assure you that our response to matters such as those related to IE Bulletin 80-06 are receiving an appropriate level of management attention to provide for timely corrective actions and to attempt to assure that such situations do not recur. I would be pleased to discuss these actions personally with you if you have any questions or would like further information.

Very truly yours,

A handwritten signature in cursive script that reads "William Cavanaugh, III". The signature is written in dark ink and is positioned above the printed name.

William Cavanaugh, III

WC:sc