

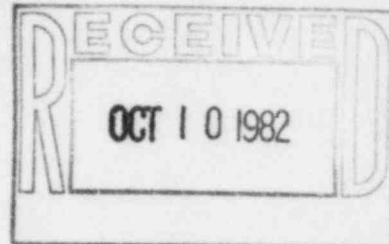


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September 29, 1982

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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 No. 50-313 & 50-368  
License No. DPR-51 & NPF-6  
Additional Information Concerning  
IE Bulletin 82-02

Gentlemen:

During a review of AP&L's initial response to IE Bulletin 82-02, "Degradation of Threaded Fasteners in the Reactor Coolant Pressure Boundary of PWR Plants," which was transmitted to NRC on August 2, 1982 (ØCANØ882Ø1), it was determined that the identification of RCPB bolted closure leaks within the scope of IEB 82-02 was not complete.

In our response to IEB 82-02 Action Item 3a, it was stated that, "During the latest operating cycle, no RCPB bolted closure leaks within the scope of IEB 82-02 have been identified." Subsequent review has revealed that on July 15, 1981, ANO-1 was taken off line to repair a leak in the "A" OTSG lower primary manway. This event was the subject of IE Inspection Report 50-313/81-24 dated August 13, 1981.

In view of the need to review documentation dating back to initial plant operation rather than just for the last operating cycle, AP&L will review all previous cycles since commercial operation to ensure that other pertinent events have not been overlooked. The results of this review will be provided by November 8, 1982.

The inspections performed and corrective actions taken in regard to the July 15, 1981 event are described in IE Report Number 50-313/81-24 authored by Mr. D. M. Hunnicutt and transmitted to AP&L on August 13, 1982. The leakage was attributed to gasket failure. During the manway opening operation, the gasket was damaged to the extent that it was impossible to determine the cause of failure.

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We have determined through our investigative efforts that the July 15, 1981, event was not reported as a Licensee Event Report. We have now determined this event is, in fact, reportable. Recognizing this to be the case, preparation of an LER is in progress for submittal by October 6, 1982, as required by paragraph 6.12.3.2.b of the Technical Specifications for thirty day written reports.

In our response to IEB 82-02 Action Item 1, two commitments were made:

1. To have in place prior to the next refueling outage, a procedure specifying accepted RCPB threaded fastener practices.
2. To complete actions that assure appropriate inspections are performed whenever a component affected by IEB 82-02 is opened for inspection or maintenance. This was to be completed prior to the next refueling outage or prior to the opening of an affected component, whichever came first.

At the present time, these two commitments are addressed by the "Reactor Coolant Pressure Boundary (RCPB) Threaded Fastener Practices" procedure, 1402.130, Revision 0. The unexpected early start of the ANO-2 refueling outage, with its attendant shift in staff priorities, caused a few days delay in obtaining final approval and issuance of the procedure. The procedure was approved on August 31, 1982.

After AP&L's August 2, 1982, response to IEB 82-02, a leak occurred in the ANO-2 "B" steam generator manway which resulted in early shutdown of the unit (one week prior to the scheduled refueling outage). The manway cover was removed to determine if special repairs would be required. The manway was opened prior to the procedure being in place; however, all inspections required by IEB 82-02 will be completed in accordance with procedure 1402.130 prior to ANO-2 startup. A description of this event will be provided along with the information required by IEB 82-02 Action Item 4 within 60 days following completion of the refueling outage in accordance with the requirements of the subject Bulletin. Also, this is discussed in LER 50-368/82-028.

In a related matter, on August 8, 1982, a seal leak occurred on ANO-1 "C" reactor coolant pump (RCP). This event (reported in LER 50-313/82-021) necessitated seal removal and replacement. The maintenance activities required removal of threaded fasteners covered by IEB 82-02 and should have been inspected per the requirements of IEB 82-02 Action Item 2 and AP&L's commitments of August 2, 1982. The unit has since been returned to power operation, precluding the possibility of performing the inspection at this time. Normal maintenance practice is to comply with the component manufacturer's recommendations for the cleaning and lubrication of component fasteners. We feel that if any significant corrosion/degradation of the "C" RCP seal flange fasteners had occurred, it would have been identified for further evaluation. As the intent of IEB 82-02 is to perform threaded fastener inspection only when affected components are required to be opened for the purposes of inspection or maintenance, AP&L does not intend to remove the threaded fasteners on the ANO-1 "C" RCP seal housing solely for the purpose of performing the inspections required by IEB 82-02, Action Item 2. However, if

maintenance or inspection of that seal is necessary during the upcoming outage, it will be inspected per IEB 82-02.

Contained within AP&L's responses to IEB 82-02 Action Items 1 and 3, two commitments were made that are now recognized as being non-specific in nature. We feel that this may present AP&L and NRC difficulty in future closeout of these items. As a result, it is our intention to further examine existing administrative control mechanisms and to incorporate the requirements of IEB 82-02 within them. The affected commitments are listed below and underlined.

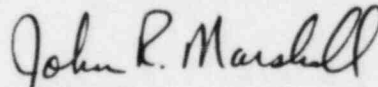
"A review of procedures addressed in IEB 82-02 is currently in progress and actions are presently being taken to assure that appropriate inspections are performed anytime a component affected by IEB 82-02 is opened for inspection or maintenance. Any new maintenance procedures developed will also include like steps. AP&L hereby commits to this being completed prior to the next refueling outage or prior to the opening of an affected component, whichever comes first."

"No injection sealant has been used that is covered by IEB 82-02. AP&L will continue to upgrade our RCPB fastener practices and reactor coolant integrity where necessary."

Further clarification of these commitments and specific actions to be taken will be provided by November 8, 1982.

As a further update to our response to IEB 82-02, we indicated in our original response to IEB 82-02 Action Item 5, that three lubricants were being used on the reactor coolant pressure boundary fasteners, namely graphite and mineral oil (50/50 mixture), Neolube and Moly-kote G. We would like to add that existing approved procedures also allow the use of N-1000 Fel Pro and Moly-kote SS.

Very truly yours,



John R. Marshall  
Manager, Licensing

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