



ARKANSAS POWER & LIGHT COMPANY  
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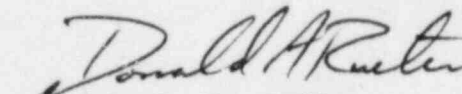
Mr. W. C. Seidle, Chief  
Reactor Project Branch #2  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

Subject: Arkansas Nuclear One - Units 1 & 2  
Docket Nos. 50-313 and 50-368  
License Nos. DPR-51 and NPF-6  
Response to Inspection Reports  
50-313/82-13 and 50-368/82-10

Gentlemen:

We have reviewed the Items of Noncompliance included in the subject reports. Attached is our response to the "Notice of Violation" included in these reports.

Very truly yours,

  
for John R. Marshall  
Manager, Licensing

JRM:GAC:s1

Attachment

cc: Mr. Richard C. DeYoung  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Mr. Norman M. Haller, Director  
Office of Management & Program Analysis  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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## NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of June 1-30, 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violations were identified:

1. Failure to Adhere to Requirements of Jumper and Lifted Lead Procedure

Unit 1 Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented, and maintained covering...a. The applicable procedures recommended in Appendix 'A' Regulatory Guide 1.33."

Administrative Procedure 1000.28, "Jumper and Lifted Lead Control," has been established in accordance with this Technical Specification.

Section 6.5 of Procedure 1000.28 requires that the person removing a temporary modification and the person verifying removal and restoration of the equipment to its normal configuration sign the appropriate space on the Jumper and Lifted Lead Log Sheet. Section 6.1.4 requires that the Plant Safety Committee perform a quarterly reevaluation of temporary modifications which have been installed for longer than three months. Sections 6.7.1 and 6.7.2 require status checks of temporary modifications monthly and prior to startups following maintenance periods.

Contrary to the above:

1. The jumpers controlled by seven log sheets were removed on April 14, 1982, but the restoration signatures were missing from the log sheets on June 21, 1982.
2. The Plant Safety Committee did not perform a quarterly review of temporary modifications between March 17 and June 30, 1982.
3. The required monthly and prestartup temporary modification status checks were not properly performed between April 14 and June 21, 1982.

This is a Severity Level V Violation. (Supplement I.E.) (313/8213-03)

Each of the three findings above are addressed separately below.

1. The jumpers controlled by seven log sheets were removed on April 14, 1982, but the restoration signatures were missing from the log sheets on June 21, 1982.

Response:

Surveillance test procedures that utilize jumpers and/or lifted leads incorporate administrative control requirements for use of these devices from Administrative Procedure 1000.28.

Administrative Procedure 1000.28 was revised during the period of April 14, and June 21, 1982, to allow the installation and removal of jumpers and/or lifted leads that are used during surveillance testing if they are controlled by the surveillance test procedure and to no longer require the use of log sheets under these conditions.

During the performance of a lengthy surveillance test (requiring approximately 1 shift to complete) it was noted that the test procedure could be changed, allowing control of jumpers within the approved test procedure itself. This change was made subsequent to initiating the seven log sheets in question. Because of this change and the timing of the change, the log sheet restoration signatures were overlooked.

The seven log sheet restoration signatures have been completed. The revised surveillance test procedure will prevent further recurrence.

Full compliance has been achieved.

2. The Plant Safety Committee did not perform a quarterly review of temporary modifications between March 17, and June 30, 1982.

Response:

The required quarterly review of temporary modifications between March 17, and June 30, 1982 was performed by PSC on July 28, 1982 in PSC meeting 82-093.

The apparent cause of this occurrence is that the quarterly logs submitted to PSC by the Operations Department were temporarily misplaced. Responsibility for submittal of the logs for quarterly review is assigned to the Operations Department and spelled out in Operations Procedures. However, there was no formal provisions for assuring receipt to assure review was accomplished within the allotted time frame. A log has been established, which is

maintained by the PSC Secretary, that will document when the last review was completed and will provide a method to anticipate receipt of quarterly logs for PSC review.

Full compliance has been achieved.

3. The required monthly and prestartup temporary modification status checks were not properly performed between April 14, and June 21, 1982.

Response:

The administrative procedure for controlling jumpers and lifted leads is supported by other procedures such as "Conduct of Operations". Revisions have been made to the supporting procedure to provide additional assurance that the requirements of the administrative procedure on jumpers and lifted leads are met and will assure proper review of this function in the future. The methods, controls, review requirements and responsibilities can be improved upon; therefore, this issue will be more comprehensively evaluated and additional corrective actions will be implemented.

The target date for completing the evaluation and corrective actions is October 15, 1982.