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U. S. Nuclear Regulatory Commission
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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
50-313/90-24; 50-368/90-24

Gentlemen:

Pursuant to the provisions of 10CFR2.201, attached is the response to the violation concerning the failure to maintain a safety-related procedure.

Very Truly Yours,

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Manager, Licensing

JJF/RMC/mmg
Attachment

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Entergy Operations Inc.

Arkansas Nuclear One (ANO), Units 1 and 2

Notice of Violation

During an NRC inspection conducted on September 10-21, 1990, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violation is listed below:

Failure to Maintain a Safety-Related Procedure

Technical Specification 6.8.1 states, in part, "Written procedures shall be established, implemented, and maintained covering ... the applicable procedures recommended in Appendix 'A' of Regulatory Guide 1.33, November, 1972..."

Appendix A of Regulatory Guide 1.33 requires that written procedures be issued to cover activities that will affect the performance of safety-related equipment.

Contrary to the above, the licensee failed to maintain Procedure 1101.02, "Instrument Setpoint," a safety-related procedure contained inaccurate information regarding safety-related instrument setpoints, and the licensee had not corrected or deleted the inaccurate information.

This is a Severity Level IV violation (Supplement 1) (313/9024-02).

Response to Violation 313/9024-02

(1) Reason for the violation

Entergy Operations has reviewed the details supporting the subject violation and have determined the cause of the failure to maintain procedure 1101.02, "Setpoints," Revision 8, dated October 20, 1988, was due to inadequate administrative guidance for controlling setpoint changes to the "Setpoints" procedure. The "Setpoints" procedure values were to have been deleted after incorporating the appropriate setpoints into the specific system operating procedures. During this incorporation process, each setpoint was checked for accuracy before inclusion in the operating procedure. The operations procedures are systematically being upgraded to the ANO Operations Procedure Writers Guide criteria.

A decision to delay deletion of procedure 1101.02 was based on the following:

- a) Availability of other documents which provide specific setpoint information
- b) Procedure 1101.02 contained a large amount of useful and accurate information not readily available at a common source
- c) Procedure 1101.02 was not used as a controlling source of setpoints, but an informational source only

Because of the above reasons and the large number of setpoints contained in procedure 1101.02, it was not routinely revised in a controlled manner.

(2) Corrective Steps Taken and The Results Achieved

Procedure 1101.02 "Setpoints" was revised to delete all the listed setpoints and to add a requirement to refer to the "Unit 1 Instrument Setpoint Index" only as a source of reference for setpoints. It cautions the user to consider other sources of information (procedures, Technical Specifications, etc.). This is due to self initiated efforts to improve control of setpoints as described in (3) below. This violation is not related to Unit 2 as they do not have a specific setpoints procedure. Applicable setpoints are contained in the Unit 2 procedures and similar index.

(3) Corrective Steps That Will Be Taken To Prevent Recurrence

The ANO Business Plan (item D.06.e), "Plant Setpoint Control Program", requires a program be developed which provides a single source of controlled setpoint information for Q active setpoints on the Station Information Management System (SIMS) database. This program is currently scheduled for completion during June, 1992. Procedure 6010.05, Rev. 0, "Plant Setpoint Control", dated November 8, 1990, was implemented to provide the guidance for implementing this system. It requires those involved in changes to setpoints to refer to applicable procedures and other sources of controlled setpoint information in the interim until the Plant Setpoint Control Program is fully implemented.

(4) Date of full Compliance:

Full compliance was achieved following the revision to procedure 1101.02, "Setpoints", Revision 9 and procedure 6010.05 "Plant Setpoint Control", Revision 0. This occurred on September 24, 1990 and November 8, 1990, respectively.