



ARKANSAS POWER & LIGHT COMPANY

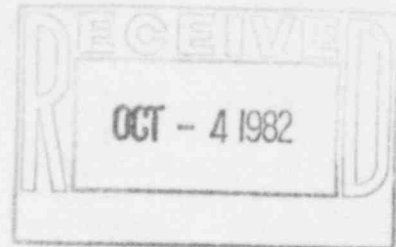
FIRST NATIONAL BUILDING/P.O. BOX 551/LITTLE ROCK, ARKANSAS 72203/(501) 371-4422

September 29, 1982

WILLIAM CAVANAUGH, III
Senior Vice President
Energy Supply

ØCANØ98218

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
Response to Appendix C

Gentlemen:

In response to your letter dated June 25, 1982, (ØCNAØ68212) providing your assessment of the compliance of our Emergency and Contingency Plans to NUREG 0654, the following is provided.

Your letter dated June 25, 1982, which contained the ANO Emergency Plan Evaluation Report (Appendix C), identified deficiencies. A number of these deficiencies are addressed (by our interpretation of the recommendations of NUREG 0654) in the current versions of the ANO Emergency Plan, the AP&L Nuclear Contingency Plan and the implementing procedures to these plans. Further, a number of the items have been previously addressed by one of the two, week long inspections conducted by NRC Emergency Preparedness Appraisal Teams.

As such, a number of the deficiencies you identified in Appendix C have been addressed in amendments (to the Emergency and Contingency Plans and implementing procedures) made subsequent to the review provided by your subject letter and made specifically to address the findings of the NRC Emergency Preparedness Appraisal Teams. It appears that your subject review of the plans and procedures was conducted on July 1981 versions. Since that time, four amendments have been made to the ANO Emergency Plan, one amendment has been made to the Contingency Plan and a number of changes have been made to the implementing procedure to these plans. (As the development and relationship between the AP&L Nuclear Contingency Plan and the ANO Emergency Plan has been questioned in the introduction to Appendix C, the attached information is provided for your clarification.)

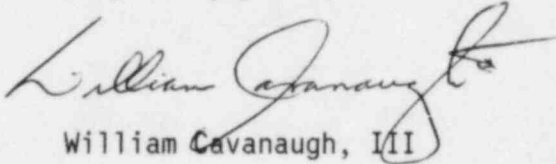
8210260180 821019
PDR ADOCK 05000313
G PDR

MEMBER MIDDLE SOUTH UTILITIES SYSTEM

September 29, 1982

AP&L is currently closing out open items associated with the Emergency Planning effort which have been identified over the past year. These items include input from the 1982 Emergency Plan Exercise Critiques (AP&L, INPO, and NRC's verbal comments), NRC Emergency Preparedness Appraisal Team comments and internally generated comments. This is a priority effort as it is imperative that the plans and procedures be finalized as soon as possible to allow for required annual retraining and final preparation of the 1983 Emergency Plan Exercise. As such, we will provide you, following our 1983 exercise (currently anticipated to occur in early March 1983), a response to Appendix C, identifying the disposition of each item.

Very truly yours,

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

William Cavanaugh, III

WC/DEJ/jm

Attachment

RELATIONSHIP BETWEEN THE AP&L NUCLEAR CONTINGENCY PLAN
AND THE ANO EMERGENCY PLAN

Following the accident at TMI and as more information became available it became apparent that AP&L needed to reevaluate the Company's existing Emergency Plan and associated procedures and make use of the TMI-2 experience in enhancing plant safety at ANO. To address these areas it was decided that a program should be established with two primary goals:

- (1) Ensure that the probability of a TMI-2 type incident at ANO remains extremely low, and that both ANO units can operate without any danger to the public health and safety.
- (2) In the unlikely event of a TMI-2 type incident at ANO, ensure that any necessary "contingency" plans, procedures and facilities are in place and that corporate personnel are thoroughly trained to cope with the situation.

Since these assessments would include an extremely diverse group of areas, a task force was mobilized to ensure that the concerns were reviewed in a consistent manner, that all aspects of each concern were adequately covered, that duplication of efforts was minimized, that solutions were not at cross purposes (i.e., that the solution in one area did not jeopardize solutions to other areas), that requests for information from outside organizations were coordinated, and that responses were prepared in a consistent manner.

One of the outcomes of this program was the development of the AP&L Nuclear Contingency Plan. This plan, whose development was begun before the issuance of NUREG 0654, was to establish a Company-wide contingency organization to be mobilized in the event of a nuclear incident. Whereas the ANO Emergency Plan was limited in many cases to the site emergency organization, its responsibilities, outside interface with support agency and its response to design basis events; the Nuclear Contingency Plan was to address the Company-wide response to the nuclear plant events which may have external impact. Originally the ANO Emergency Plan was to be a subset of the Contingency Plan addressing the ANO specific responses. During the development of the above, the NRC published its revised 10CFR50.54 and its associated Appendix E. This new regulation required AP&L to redirect its efforts and develop the ANO Emergency Plan first. Following development of the Emergency Plan, AP&L subsequently completed the Contingency Plan consistent with our original program.

AP&L continues to believe that the concept of two separate plans, one addressing the ANO specific response and the other the Company wide response, is the most effective means to address AP&L emergency response. By having the Contingency Plan and the Emergency Plan, both organizations have a plan specifically addressing their area of responsibility. Both the Contingency Plan and the ANO Emergency Plan describe AP&L's emergency response. The two plans rely on each other, and have been set up to effectively support each other. AP&L has only one Emergency Response

Organization (ERO), which is described in the ANO Emergency Plan. The Contingency Plan describes in depth the corporate portion of this response organization. However, because AP&L has two separate plans, this does not mean that an individual in one organization does not have a need to know the basic plan of the other. The retraining program will address both plans and an additional effort will be made to train the principal ANO Emergency Response Organization personnel on the Contingency Plan and its procedures. Additional copies of the Contingency Plan will also be distributed to ERO personnel at ANO before the 1983 exercise.