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March 21, 1983

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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, TX 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 50-313/83-01 and 50-368/83-01

Gentlemen:

We have reviewed the subject inspection report. Please find attached our response to the "Notice of Violation" included in the report.

Very truly yours,

John R. Marshall Manager, Licensing

JRM: RJS: s1

Attachment

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

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Based on the results of an NRC inspection conducted during the period of January 1-31, 1983, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violation was identified:

Unit 1 Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented, and maintained covering...C. Surveillance and test activities of safety related equipment."

Procedure 1307.05, "Station Batteries," has been established in accordance with this Technical Specification.

Step 11.3.2 of Procedure 1307.05 states that in order to obtain an accurate reading of specific gravity for each battery cell, it is necessary to take three samples of electrolyte from the sampling tube, discharging the first two hydrometers full of sample into the filler vent, and then withdrawing the third sample for the reading.

Contrary to the above. on January 10, 1983, the NRC inspector observed maintenance personnel taking specific gravity readings on the Unit 1 station battery D07 by filling the hydrometer with electrolyte one time and taking a reading from this first sample.

This is a severity Level V Violation. (Supplement I) (313/8301-01)

## RESPONSE

Following notification of this issue, all affected battery cells were retested using the correct procedural steps and found to be operable.

Step 7.2.4 of Procedure 1307.05 is the specific step in question. The requirement for drawing three samples is actually located in Step 11.3.2. Section 11.3 is referenced by Step 7.2.4 but is not actually included in Step 7.2.4.

Investigation of the occurrance indicated inadequacies in training and inefficiency in the procedural format. A revised procedure (incorporating the three sample requirement directly into Step 7.2.4) has now been implemented. Proper training on Procedure 1307.05 has been provided to the applicable personnel.

With the completion of the retraining and implementation of the revised Procedure 11307.05 on March 14, 1983, full compliance has now been achieved.

It should be noted that the testing method actually observed by the IE Inspector results in conservative results as compared to the three sample method. From previous experience, we have noted that some stratification of electrolyte occurs with time resulting in conservatively low specific gravity readings. In past testing, batteries have been declared inoperable due to low specific gravity (using one draw) due to the effects of stratification. Retesting after mixing indicated the batteries were actually operable. Thus, our procedures were changed to incorporate mixing during the drawing of samples. We therefore conclude that there was no degradation in the safe operation of the facility as a result of this event.

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