

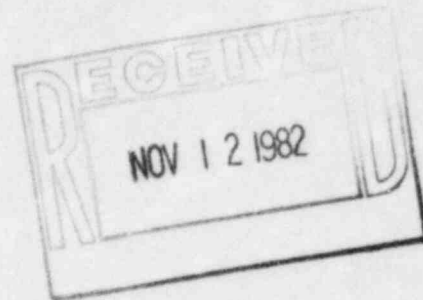


ARKANSAS POWER & LIGHT COMPANY  
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November 8, 1982

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Mr. John T. Collins  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
511 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011



SUBJECT: Arkansas Nuclear One - Unit 1 and 2  
Docket No. 50-313 and 50-368  
License Nos. DPR-51 and NPF-6  
Additional Information Concerning  
IE Bulletin 82-02

Gentlemen:

Our letter dated September 29, 1982, (ØCANØ9821Ø) committed to provide clarification of previous commitments and the results of a review of documentation to identify events relating to IE Bulletin 82-02. These two items are provided in Attachment 1.

Very truly yours,

John R. Marshall  
Manager, Licensing

JRM/DM/JK/rd

Attachment

IE11

8212140481 821108  
PDR ADOCK 05000313  
G PDR

## ATTACHMENT 1

### ITEM 1

Contained within AP&L's responses to IE Bulletin 82-02 (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 IE Bulletin 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.

### RESPONSE:

Presently, a copy of Procedure 1402.130, "Reactor Coolant Pressure Boundary Threaded Fastener Practices" is attached to each job order where a RCPB is to be breached. Contained within this procedure are the training and inspection requirements of IE Bulletin 82-02 Action Items 1 and 2. Although this method provides adequate assurance that applicable components are inspected per IE Bulletin 82-02, AP&L believes that the intended actions can be more efficiently accomplished. A list of components to be covered by IE Bulletin 82-02 has been developed and is presently being reviewed. After the list is refined, it will be included in AP&L's procedure 1402.130, "Reactor Coolant Pressure Boundary (RCPB) Threaded Fastener Practices." This list will be refined and included in Procedure 1402.130 by March 10, 1983.

In lieu of our present method of developing a separate procedure for each component, we will have in place by May 25, 1983, a General Procedure, 1402.129, "Cleaning and Inspection of Threaded Fasteners at ANO Units 1 & 2", that will cover cleaning, inspection and inspector qualifications for all Threaded Fasteners applicable to IE Bulletin 82-02, at Arkansas Nuclear One. There will be an attachment to this procedure for each component listed in Procedure 1402.130, delineating any or all specific requirements for that component. Also this

procedure will specify that all IE Bulletin 82-02 related inspections shall be performed by certified inspectors, as do our present procedures.

## ITEM 2

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.

## RESPONSE

The list below represents the results of an indepth review of material to determine the number of leaks occurring on bolted closures which are addressed in IE Bulletin 82-02, namely "(1) steam generator and pressurizer manway closures, (2) valve bonnets, and pump flange connections installed on lines having a nominal diameter of 6 inches or greater and (3) control rod drive (CFD) flange and pressurizer heater connections that do not have seal welds to provide leak-tight integrity." This list includes both ANO-1 and ANO-2 and goes back to first day of commercial operation.

The following resources were utilized to determine the number of leaks that have been experienced on both units since commercial operation. Flanges which utilized pressure seals (i.e., check valve bonnets) were not considered as bolted closures. Also valve stem leaks which were related to packing misalignment were disregarded.

- A. A search on the computerized record system was conducted for events pertinent to IE Bulletin 82-02, utilizing information contained in the document types listed below and other documents cross-referenced to them:
  - 1) performance evaluation request (PER)
  - 2) report of abnormal condition (RAC)
  - 3) licensee event report (LER)
  - 4) equipment performance evaluation report (EPER)
  - 5) equipment failure evaluation report (EFER)
  - 6) plant engineering action request (PEAR)
  - 7) job orders
- B. A manual review of the RAC log
- C. A manual review of the LER log
- D. A manual review of all LER's
- E. One other resource utilized was plant personnel on site, with sufficient time and experience on the plant site during past operation, to identify from memory any past occurrences of bolted closure leaks.

Pertinent events identified:

ANO-1

Date: 7/14/81  
Source: "A" OTSG Primary Manway, Leakage ~ 3.4 gpm  
Power Level: 100%  
RCS Pressure: 2155  
Apparent Cause: Deteriorated gasket, low breakaway torque values for the studs. Eroded pressure bearing surfaces.  
Corrective Action: Machining performed on OTSG and OTSG manway surfaces. Reassembly and inspection performed per plant procedures and vendor recommendations.

ANO-1

Date: 5/10/78  
Source: Pressurizer Heater Bundle Flange  
Power Level: 100%  
RCS Pressure: 2155  
Apparent Cause: Gasket Failure  
Corrective Action: Removed and replaced gasket. Inspected sealing surfaces and studs per AP&L plant procedures and vendor recommendations. Seal welded flange to ensure against future leaks per Work Plan 52. Remaining Bundle Flanges seal welded during following refueling outage per Work Plan 65.

ANO-1

Date: 5/11/79  
Source: Reactor Vessel Head O-Ring  
Power Level: Mode 6 Refueling  
RCS Pressure: 14.7 psia  
Apparent Cause: Upon completion of the refueling, the vessel head was installed by B&W, using an O-Ring of incorrect size. The result was plastic deformation occurring to the vessel flange grooves.  
Corrective Action: The head was removed and the grooves were repaired. The O-Ring was replaced by one of correct size and the head reinstalled.

ANO-1

Date: 4/18/78 (repaired)  
Source: CF-1B (Body to Bonnet weepage)  
Power Level: Mode 1 Power Operations  
RCS Pressure: 2155 psi  
Apparent Cause: Flexitallitic gasket was of incorrect thickness for valve. The body to bonnet metal flanges were touching before the gasket was fully compressed, allowing seepage past the seal.  
Corrective Action: Valve flange seal area was cleaned and seal welded per AP&L specifications and vendor recommendations.

ANO-2

Date: 8/20/82  
Source: "B" S/G Primary Manway Leakage: 3gpm  
Power Level: 75%  
RCS Pressure: 2250  
Apparent Cause: Indeterminable  
Probably Cause: Low manway study torque value.  
Corrective Action: Repair manway cover and replace gasket per plant  
procedures and vendor recommendations.