



July 19, 1994

OCAN079403

U. S. Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, DC 20555

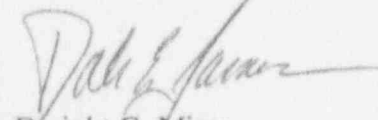
Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Response to Inspection Report
50-313/94-04; 50-368/94-04

Gentlemen:

Pursuant to the provisions of 10CFR2.201, attached is the response to the violations identified during the inspection of activities associated with the failure to ensure adequate containment building close-out and failure to implement an oversight program to assure that calibrated ammeters are used to monitor welding equipment.

Should you have questions or comments, please call me at 501-964-8601.

Very truly yours,

Soi 
Dwight C. Mims,
Director, Licensing

DCM/slp

Attachments

JE01

U. S. NRC
July 19, 1994
PAGE 2

cc: Mr. Leonard J. Callan
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

NRC Senior Resident Inspector
Arkansas Nuclear One - ANO- 1 & 2
Number 1, Nuclear Plant Road
Russellville, AR 72801

Mr. George Kalman
NRR Project Manager Region IV/ANO-1 & 2
U. S. Nuclear Regulatory Commission
NRR Mail Stop 13-H-3
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

NOTICE OF VIOLATION

During an NRC inspection conducted on March 20 through April 30, 1994, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Technical Specification 6.8.1 a states, in part, that written procedures be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Section 3.f.(1) of Appendix A to Regulatory Guide 1.33, Revision 2, February 1978 states, in part, that instructions for changing modes of operation should be prepared as appropriate for maintaining containment integrity.

Attachment C of Procedure 2102.001, *Plant Pre-heatup and Pre-critical Checklist*, requires items in the containment building to be secured or, if they are to remain in the building, that the items be evaluated for their effect on plant operation.

Contrary to the above, on April 18, 1994, items such as ropes and instrumentation cables were neither evaluated for their effect on plant operation nor secured in the containment building.

This is a Severity Level IV violation. (Supplement I) (368/9404-03)

- B. 10 CFR 50, Appendix B, Criterion V, states, in part, that activities affecting quality be accomplished in accordance with instructions.

Procedure 6030.007, Revision 0, dated March 31, 1993, *Control of Plant Modification Welding*, Step 6.1.5, requires that uncalibrated ammeters used to perform welding machine amperage checks be verified with a calibrated ammeter at least once per month and that a log of all uncalibrated meters in use be documented.

Contrary to the above, as of April 5, 1994, uncalibrated ammeter checks have not been performed and logged.

This constitutes a Severity Level IV violation. (Supplement I) (313/9404-04; 368/9404-04)

A. Response to violation 368/9404-03

(1) Reason for the violation:

The walkdown of the Unit 2 containment building is documented in Attachment "C" of Procedure 2102.001, *Plant Pre-heatup and Pre-critical Checklist*. This procedure requires an engineering evaluation for all items that are to remain in the containment building during power operation.

On April 18, 1994, prior to heat-up from the Unit 2 refueling outage, several discrepancies were identified during a walkdown of the Unit 2 containment building. These discrepancies included sections of rope secured to containment spray headers which are used to hold integrated leakrate (ILRT) instrumentation, a fire blanket, loose conduit, a loose junction box, and tool lanyards secured to handrails of the refueling canal. Additionally, debris and unsecured bus bars were identified in the polar crane area; however, Procedure 2102.001 did not require an inspection of this area. All discrepancies were removed or evaluated prior to criticality except the ropes used for ILRT instrumentation.

The ILRT ropes were determined to have been in place since refueling outage 2R8, which was completed in April of 1991. At the time the ILRT ropes were placed in the containment, Procedure 2102.001 did not require an engineering evaluation for items to be left in the containment building during power operations. A visual inspection completed at the end of 2R8 did not identify these ropes as discrepancies.

The root cause of this event was determined to be the failure to provide and implement a strategy or process to close out the containment building to the desired level of detail.

(2) Corrective steps taken and results achieved:

An engineering evaluation was completed on the ILRT ropes. The evaluation concluded that there were no sump concerns during post accident recirculation and no other potential operability impacts exist with the ropes remaining in the containment building.

Procedure 2102.001, *Plant Pre-heatup and Pre-critical Checklist*, was revised to add an inspection of the polar crane area.

(3) Corrective steps that will be taken to prevent further violations:

The ILRT ropes will be added to Procedure 2102.001, *Plant Pre-heatup and Pre-critical Checklist*, by September 1, 1994.

A work team has been established to develop guidelines for a multi-discipline containment building walkdown prior to heat-up following an outage. This work team will consist of personnel from operations, system engineering, maintenance, design engineering, modifications, and quality control. ANO Unit 1 and Unit 2 will implement the results of the work team by January 15, 1995. This is prior to the next scheduled outage.

(4) Date when full compliance will be achieved:

Full compliance for this event was achieved on May 5, 1994, when the engineering evaluation was completed for the ILRT ropes. Full compliance to correct the overall condition will be accomplished on January 15, 1995, when the results of the work team are implemented.

Response to violation 313/9404-04; 368/9404-04

(1) Reason for the violation:

Two procedures implemented the welding program at Arkansas Nuclear One (ANO), Procedures 6030.007, *Control of Plant Modification Welding*, and 1025.013, *Conduct of Maintenance Welding*. Both procedures provided guidance for the Modifications and Maintenance department welding personnel and generally contained the same requirements. Each procedure required monthly amperage checks of welding machines with either an uncalibrated or calibrated ammeter. The uncalibrated ammeters were required to be checked with a calibrated ammeter at least monthly. A review of the welding procedure documentation revealed that the welding machine amperage checks were being performed as required; however, the uncalibrated ammeters were not being checked with calibrated ammeters as required. Additionally, Procedures 1025.013 and 6030.007 did not contain definitive instructions for assigning departmental responsibility for implementation of the ammeter checks. Therefore, the root cause for the checks not being performed was inadequate instructions in the procedures for assigning responsibility for the performance of the ammeter checks.

Supporting the welder qualifications are the Quality Control (QC) personnel who regularly perform intermittent surveillance checks of in-process welding, including amperage checks with calibrated ammeters. QC personnel perform documented welding surveillance's a minimum of four times per month. QC inspectors also perform undocumented checks on a random basis. These surveillance's have identified a low incidence of weld discrepancies which indicates the welders are highly skilled and are adhering to the requirements of the ANO welding program. Also, since October 1991, only one instance of a welding machine amperage being out-of-range has been identified.

(2) Corrective steps taken and results achieved:

On April 7, 1994, with the exception of one broken uncalibrated ammeter, the uncalibrated ammeters were compared with calibrated ammeters and were found to be within the established tolerance.

On May 4, 1994, Procedures 6030.007, *Control of Plant Modification Welding* and 1025.013, *Conduct of Maintenance Welding* were combined into one procedure, 5120.119, *Control of Plant Welding*. The new procedure added the requirement that inactive weld machines be checked during the initial welding activity. The new procedure deleted the requirement to check the uncalibrated ammeters with a calibrated ammeter. The deletion of this item is based on the conclusion that this check did not provide any appreciable improvement to the welding process quality at ANO. A search of ASME codes and commitment requirements indicated that there is no related requirement for these checks. In

summary, the use of uncalibrated ammeters in the field to check welding equipment performance was an additional enhancement to the welding program at ANO, but is not necessary to ensure weld quality.

On June 29, 1994, the administrative lesson plan for incoming personnel involved with the ANO plant welding program incorporated the results of the new requirements for Procedure 5120.119, *Control of Plant Welding*.

On June 30, 1994, training was completed on Procedure 5120.119, *Control of Plant Welding* for the ANO site personnel involved with the plant welding program. The training session included lessons learned from the Condition Report that documented the problem and resolution associated with this violation.

On July 19, 1994, Procedure 5120.119 was further revised to add the requirement that the welders shall use calibrated ammeters when amperage checks are performed. The previously existing requirement to check the active welding machines amperage monthly was changed to an annual check. The vehicle to document the active welding machine annual check was enhanced by placing this requirement on the job order planning computer Station Information Management System (SIMS). The SIMS computer automatically generates the annually scheduled Planned Maintenance (PLM) job order. The PLM is a repetitive task which provides a means of controlling routine recurring tasks.

(3) Corrective steps that will be taken to prevent further violations:

Corrective steps to prevent further violation have been taken and completed.

(4) Date when full compliance will be achieved:

Compliance to Procedure 6030.007, Revision 0, dated March 31, 1993, *Control of Plant Modification Welding*, Step 6.1.5, was achieved on April 7, 1994, when the uncalibrated ammeters were compared with the calibrated ammeters and found to be within the established tolerance.