



ARKANSAS POWER & LIGHT COMPANY
POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000

May 12, 1983

ØCANØ583Ø6

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
50-313/83-04 and 50-368/83-04

Gentlemen:

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

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

8305310199 830525
PDR ADOCK 05000313
Q PDR

NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of March 14-18, 1983, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violations were identified:

1. Failure to Conduct Design Change Reviews by the Off-Site Engineering Group

10 CFR Part 50, Appendix B, Criterion V, requires, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures... and shall be accomplished in accordance with these instructions, procedures...."

The Arkansas Power and Light Company's Quality Assurance Topical Report, Revision 5, states, in part, in paragraph 3.3.1, "To assure that the design is adequate and that the above requirements and procedures are satisfied, each design is reviewed by Generation and Construction LRGO personnel."

Contrary to the above, it was found that the review of plant originated design changes by the offsite engineering group was neither required by procedure nor conducted.

This is a Severity Level V Violation. (Supplement I) (50-313/8304-01; 50-368/8304-01)

RESPONSE:

At the time Revision 5 of the AP&L Quality Assurance (QA) Topical Report was approved, all design engineering was performed by the off-site engineering group with some input by a small on-site engineering staff. To assure adequate controls were maintained, Revision 5 of the QA Topical Report included the requirement that all design activities be reviewed by the off-site group. Since the approval of Revision 5, however, a formal on-site engineering group was established and appropriate procedures were implemented to allow design changes to be prepared, approved and processed by the on-site engineering group. These procedures were reviewed and approved to assure necessary controls were maintained and the intent of the QA program was not degraded. However, paragraph 3.3.1 of Revision 5 was not changed accordingly. Subsequent to the receipt of this violation, Quality Assurance has been requested to revise the QA Topical to reflect the actual procedural requirements for review of each design change affecting ANO. A revision of the AP&L QA Topical Report is currently being prepared and will reflect the change discussed above. This revision is scheduled to be submitted to the NRC for approval by June 10, 1983. Upon approval of Revision 6 by the NRC, full compliance will be achieved.

2. Failure to Follow Procedures Regarding the Forms Used in the Closeout of Design Change Packages

10 CFR Part 50, Appendix B, Criterion V, requires in part, "Activities affecting quality shall be prescribed by documented instructions,

procedures... and shall be accomplished in accordance with these instructions, procedures...."

Arkansas Nuclear One Procedure 1000.05 requires that forms required by a procedure to be used shall be appended to the procedure as an attachment and shall be numbered with the procedure and an alphabetical suffix.

Contrary to the above, Form 1000.13E, which is used as a cover sheet and control on the closeout of design changes and modifications, was not an attachment to Procedure 1000.13, although this procedure directed its use.

This is a Severity Level V Violation. (50-313/8304-02; 50-368/8304-02)

RESPONSE:

Subsequent to notification of Item 50-313/8304-02; 50-368/8304-02, the following corrective steps have been taken. A procedure revision has been initiated to incorporate Form 1000.13E into Procedure 1000.13 as required. A station policy has been issued regarding procedure compliance. Plant personnel will receive specific training on this policy.

Procedure 1000.13 will be revised to include Form 1000.13E by June 1, 1983. Training on the procedural compliance policy will be completed by August 1, 1983.