

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20545

JUL 28 1983

MEMORANDUM FOR: William C. Seidle, Chief ✓
Reactor Projects Branch 2
Division of Resident Reactor Projects
and Engineering Programs
Region IV

FROM: Karl V. Seyfrit, Chief
Reactor Operations Analysis Branch
Office for Analysis and Evaluation
of Operational Data

SUBJECT: EVALUATION OF LERs FOR ARKANSAS UNIT 2 FOR
THE PERIOD FROM JULY 1, 1982 TO JUNE 30, 1983 -
AEOD INPUT TO SALP REVIEW

In support of the ongoing SALP reviews, AEOD has reviewed the LERs for Arkansas-2. This review has focused on the usefulness of the submittals to AEOD, and on the accuracy and completeness of the events reported. In general, we found the licensee's submittals to be about average in terms of reporting completeness and factual accuracy. The reports were informative, understandable, and they consistently met the guidelines offered in Regulatory Guide 1.16 and NUREG-0161. However, we thought several LERs that were not promised to be updated by the licensee should have been updated to identify the final corrective action when several possible corrective actions were postulated in the original LER.

For AEOD's purpose, the LERs were reasonably consistent and sufficiently detailed to understand the event so that an informed safety assessment and its potential consequences could be made by someone reasonably familiar with the plant.

The enclosure provides additional observations from our review of the LERs. If you have any questions regarding this report, please contact either myself or Ted Cintula of my staff.

Karl V. Seyfrit
Karl V. Seyfrit, Chief
Reactor Operations Analysis Branch
Office for Analysis and Evaluation
of Operational Data

Enclosure: **XA** Copy Has Been Sent to PDR
As stated

cc: w/enclosure
L. Callan, RIV
R. Lee, NRR

830809 0279 **XA**

SALP REVIEW FOR ARKANSAS-2

The licensee submitted about 50 LERs for Unit 2 in the assessment period from July 1, 1982 to June 30, 1983. Our review included the following LER numbers:

82-023 through 82-052
83-001 through 83-024

Three of these consecutively numbered LERs (82-035, 051 and 83-013) could not be retrieved from the NRC or INPO data base and, consequently, were not part of this review.

Three reports were updated in the assessment period and they were included in our review. These reports were the initial updates to LER numbers:

82-033
82-036
83-010

The review and comment on LERs covered the following subject matter:

1. Review of LERs for Completeness.

- a) The information in the narrative sections and the attachments was generally sufficient to fully understand the event so that an informed safety assessment and its potential consequences could be made by someone reasonably familiar with the unit. In our opinion, every LER had sufficient information to provide the reader with a good understanding of the event. We did note, however, that the narrative passages for items (10) and (27) in NRC Form 366 (the LER form) often were not short enough to fit the number of computer spaces available (7 and 5 lines of 72 spaces each). This is contrary to the guidance offered by NUREG-0161.

b) Review of Coded Information

We checked the codes the licensee used against the narrative sections for accuracy. In our review we disagreed with the licensee's choice of component code seven times, and the system code once. We agreed with the licensee's choice on all other coded fields. In view of quantity of coded information available in this review, we do not believe there are any significant problems with the digital information provided by the licensee.

c) Do the reports contain supplementary information when needed?

The licensee submitted seven ten-day reports in the assessment period. Of these, only 83-014 did not provide the mandatory supplemental information. A recent previous (and referenced) report, 83-009, on the same subject, did contain the mandatory supplemental information, so a repeat of this information was not essential to the understanding of LER 83-014. Several of the thirty-day reports did contain additional supplemental information to provide a clearer understanding of the event. In addition, we noted LERs 83-008 and 022 (both thirty-day reports) had tables to further clarify specific locations of the described problems.

d) Followup Reports

The licensee promised two followup reports (83-008 and 009). These were not received in the assessment period, nor have they been received to date. As previously mentioned, three

other reports (that were not originally promised to be updated by the licensee) were updated. LER 82-033 was updated to correct typos in the original LER. The other two followup reports were updated with additional information. We thought several other reports (LERs 82-023, 027, 028, 031 and 046) should have been updated by the licensee to provide information as to the final corrective action when several possible corrective actions were postulated by the licensee in the original LER. We noted that the three updated reports received from the licensee did not comply with the style change guidance of NUREG-0161.

e) Were similar occurrences properly referenced?

Previous LER numbers of events of a similar nature were referenced in the LERs. In addition, we noted, starting about with LER 82-034, the licensee stated when there have been no similar previous occurrences. A statement of this nature eliminates doubt as to whether similar events were unintentionally not referenced by the licensee.

2. Is component failure or other appropriate information being reported to NPRDS?

The licensee claims to be reporting events of this nature to the Nuclear Plant Reliability Data System.

3. Multiple event reporting in a single LER

LERs 82-023, 033, 83-008, 009 and 022 reported multiple events with a single LER. Each of these events were combined correctly into the single LER report in accordance with the guidance offered in NUREG 0161.

4. Relationship between PNs and LERs

Seventeen PNs were issued in the SALP assessment period. Only four of the PNs were further documented by LERs (82-028, 052, 83-010 and 015). LERs were not issued for the following relatively significant events:

PN0-IV-82-27 A control rod drop that required an outage of greater than 2 days.

PN0-IV-82-32 The licensee and its contractor, Bechtel, identified approximately 130 deficiencies while reviewing a sample of about 500 pipe supports.

PN0-IV-82-43 When the main turbine tripped, some of the steam generator safety valves lifted. The resultant additional steam flow caused excessive reactor coolant system cooldown. The rapid primary system cooldown caused a reactor trip from 10% power on low DNBR.

PN0-IV-83-01 Condenser tube leakage caused an outage of approximately 5 days.