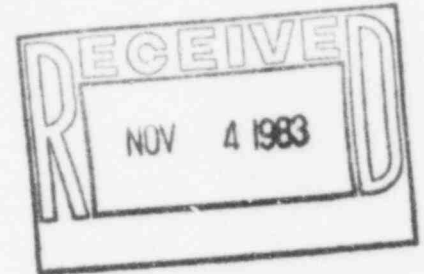




ARKANSAS POWER & LIGHT COMPANY
 POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000

November 3, 1983



ØCAN1183Ø1

Mr. J. E. Gagliardo, Director
 Division of Resident Reactor Projects
 and Engineering Programs
 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
 1982/1983 Systematic Assessment of
Licensee Performance (SALP) Report

Gentlemen:

By letter dated September 29, 1983, (ØCNAØ98317) NRC transmitted the Systematic Assessment of Licensee Performance (SALP) report for Arkansas Nuclear One for the period of July 1, 1982, through June 30, 1983. Subsequently, on October 14, 1983, AP&L representatives met with members of the NRC staff to discuss the content of the SALP report. This letter constitutes AP&L's comments on the subject report in accordance with the guidance provided in your September 29, 1983, letter.

As noted in our response to previous SALP reports, AP&L has supported and continues to support the goals and objectives of the SALP process. An objective assessment of licensee performance is useful to both the licensee and the NRC. Such a process promotes continued enhancements in safety as well as providing a tool which enables both the licensee and NRC to better utilize resources by focusing on areas with the greatest potential for improvement. In order to accomplish these goals, the SALP report must be objective, comprehensive, and must address both the strengths and weaknesses of each area evaluated. Based on our review of this years report and discussions in the SALP review meeting, we feel the 1982/1983 SALP review effectively meets the intended purposes of the SALP process. We feel the report is both objective and comprehensive, and addresses the strengths and weaknesses of each area of evaluation.

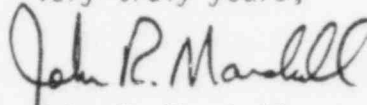
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November 3, 1983

In order to fully realize the potential benefits of the SALP process, AP&L must now utilize the recommendations and observations of the SALP board in our efforts to improve performance. It remains AP&L's goal to operate the ANO units in the safest possible manner and to fully comply with NRC regulations. We intend to use the SALP report in our continuing effort to meet these goals.

Attached are specific comments on selected areas of the report. These comments are intended to provide clarification and/or additional information relative to specific items referenced in the report.

Very truly yours,

A handwritten signature in dark ink, appearing to read "John R. Marshall". The signature is fluid and cursive, with the first name "John" being more prominent.

John R. Marshall
Manager, Licensing

JRM:DRH:sc

Attachments

COMMENTS ON 1982/1983
SALP REPORT

Item 1

Item IV.C.1.d on page 14 of the report refers to an LER describing an event in which an unqualified spare part was used during the repair of a pressure switch. The summary of this item incorrectly states the unqualified part failed, rendering the pressure switch inoperable. The installation of the unqualified part was discovered by AP&L personnel during a review of documentation. The part was replaced prior to returning the unit to power following the installation of the subject part during an outage. There was no actual component failure involved.

Item 2

Item IV.I, Licensing Activities, contains a reference to a deviation involving a failure of the commitment tracking system. The item concerns the failure to submit equipment test reports to a NRC contractor on a previously committed schedule. While the referenced deviation (Unit 1, Deviation 8219) did appear in an inspection report issued during the 1982/1983 evaluation period, a review of the previous SALP report indicates this item has been previously addressed. Specifically, Attachment 1 to the 1981/1982 SALP report dated March 4, 1983, (OCNA038302) noted that AP&L had been given a Category 3 rating for responsiveness in the area of environmental qualification. In discussions during the November 30, 1982, SALP review meeting it was clear that this was based solely on the deviation discussed above. This issue is discussed in detail in AP&L's response to the 1981/1982 SALP report dated December 20, 1982, (OCAN128209) pages 61 and 62. It does not seem appropriate that this one item should be included in both reports.

Item 3

The area of Fire Protection (IV.E) was rated in Category 3 in the 1982/1983 SALP report. As discussed during the October 14, 1983 meeting, AP&L had previously recognized the need for improvements in this area and is currently proceeding with a comprehensive program to assure full compliance is achieved and maintained and that an effective fire protection system/program is maintained at ANO.

The program currently underway was described in detail in a meeting with the Region IV staff on October 3, 1983. The program began in February of 1983 with an effort to consolidate all AP&L fire protection commitments and requirements into a single, user oriented document. This was needed due to the complicated regulatory history of this issue and involved the consolidation of over 400 separate documents. This effort was completed in August of 1983.

Following completion of the initial effort AP&L began a 100% walkdown of all fire protection features installed at ANO to verify conformance with requirements. This effort is now in progress and is approximately 40% complete.

In parallel with the walkdown effort, AP&L is developing necessary controls to assure continued compliance is maintained. In the interim, until we are confident controls are fully implemented and effective, a continuous roving fire inspector has been established in each unit.

We feel the above actions will provide a basis for much improved performance in this area.

Item 4

Item IV.F.1, Emergency Preparedness, describes an event in which AP&L failed to complete upgrade to the Public Education and Information program within the time period originally committed. Specifically, the item concerned the adequacy of the distribution of information brochures to the public. We do not feel the description of this item in the report is complete. While it is correct that our December 10, 1982, (0CAN128204) letter committed to upgrade the existing program in order to resolve certain NRC concerns, the report does not reflect AP&L's position, as stated in the same letter, that the program in effect at the time fully complied with the regulations governing this issue.

As noted in the SALP report, the upgrades as well as the original program were implemented by the Arkansas State Health Department. During the implementation of the upgrades, delays were encountered in the procurement process for new holders for the brochures. While these delays did result in extending completion of the upgrades beyond the originally scheduled date, the NRC was kept fully abreast of the progress and did not indicate dissatisfaction. We feel that both AP&L and the Arkansas State Health Department responded in a reasonable and timely manner to resolve NRC concerns in this area which extended beyond the regulatory requirements.

Enclosure 3

SALP Management Meeting
October 14, 1983

John R. Marshall	Manager, Licensing
William Cavanaugh	Senior Vice President, Energy Supply
James M. Levine	ANO General Manager
Guy J. Vissing	Project Manager, ANO-1 (NRC/NRR)
Robert S. Lee	Project Manger, ANO-2 (NRC/NRR)
L. J. Callan	ANO SRI
Jim Miller	Chief, ORB #3, NRR
W. C. Seidle	NRC - R IV
J. T. Collins	NRC - R IV Regional Admin.
Richard Bangart	NRC - R IV, Director, Div. of Vendor/Technical Programs
John M. Griffin	Vice President, Nuclear Operations Programs
Basil A. Baker	ANO Operations Manager
Lloyd W. Schempp	Manager of Nuclear QC, ANO
Jim Cummins	NRC RI ANO
Duke Dow	Manager, Nuclear Services
Early Ewing	Manager, Engineering and Technical Support
Dan Howard	Licensing Supervisor - ANO-1
Bob Morehead	Director of Energy Supply Services
Dan Moeggenberg	Acting Manager Special Projects - ANO
J. Ted Enos	Licensing Supervisor - ANO-2
Larry W. Humphrey	ANO- Administrative Manager
Edward L. Sanders	ANO - Maintenance Manager
Carroll Dunn	Manager, Corporate Security
Donald G. Horton	Manager, Quality Assurance