

DMB

MAY 14 1984

In Reply Refer To:  
Dockets: 50-313/83-26  
50-368/83-26

Arkansas Power & Light Company  
ATTN: John M. Griffin, Senior  
Vice President - Energy Supply  
P.O. Box 551  
Little Rock, Arkansas 72203

Gentlemen:

Thank you for your letter of February 7, 1984, in response to our letter and Notice of Deviation dated December 9, 1983. As a result of our review, we request additional information relative to your answer to the Notice of Deviation regarding satisfying minimum experience for the radiochemistry technician position. Our concerns regarding the deviation were identified as Open Item 313/8212-02; 368/8225-02 in NRC inspection Report 50-313/82-12; 50-368/82-25, discussed in NRC Inspection Report 50-313/83-26; 50-368/83-26, and discussed during a telephone conversation between Messrs. B. Murray and B. Nicholas of this office and Messrs. D. Howard, T. Cogburn, E. Ewing, and T. Baker of your staff on March 16, 1984.

Our primary concern involves your failure to satisfy the 2-year experience criteria for radiochemistry technicians. As discussed in paragraph 6 of NRC Inspection Report 50-313/83-26; 50-368/83-26, we are concerned regarding the high turnover rate that has occurred within your radiochemistry staff. Personnel selected as replacements had no prior operating nuclear power plant experience or practical radiochemistry experience. Acceptable radiochemistry experience as used in ANSI N18.1-1971 would involve actual experience in a radiochemistry laboratory. This should include: (1) a thorough knowledge of primary chemistry and radiological effluent technical specifications, (2) calibration and operation of all radiochemistry analytical instruments used in your laboratories, and (3) wet chemistry techniques associated with radiochemistry analytical procedures.

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RBangart  
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It is Region IV's position that radiochemistry technicians functioning in "responsible positions" must have 2 years of working experience in radiochemistry which to be in agreement with your FSAR commitment to satisfy ANSI N18.1-1971. We consider that all radiochemistry technicians who perform radiochemistry or coolant chemistry, chemistry related to radioactive effluents, and analysis of radioactive samples, without the direct supervision of ANSI N18.1-1971 qualified technicians or supervision, are considered to hold responsible positions. New hires at operating facilities should be expected to meet the experience criteria of 2 years of experience in their specialty before being allowed to function without this direct supervision. They must have 2 years of experience in order to fill responsible positions.

In your response to the Notice of Deviation you stated that there were four persons in radiochemistry in responsible positions. Please include in your response, your plans to utilize these qualified individuals since it does not appear that you have a sufficient number of ANSI qualified technicians to oversee laboratory activities, conduct new radiochemistry technician on-the-job training, and oversee plant operations on a 24 hour basis.

Your response states that radiochemistry personnel are evaluated against written criteria to establish their qualifications and referenced a memorandum written November 5, 1981. After further review of the referenced memorandum and as stated in paragraph 6 of NRC Inspection Report 50-313/83-26; 50-368/83-26, the minimum experience and training criteria for new hires as a radiochemist (radiochemistry technician) does not agree with the experience requirements for radiochemistry technicians as committed to in the FSAR. A review of the experience history for 16 individuals currently assigned as radiochemistry technicians indicated that all 16 of the radiochemistry technician staff did not have experience in radiochemistry prior to their assignment. In your response, please also indicate how position descriptions reflect the difference in duties for ANSI N18.1-1971 qualified personnel and those in trainee technician assignments. We are concerned at the apparent lack of management oversight to ensure that individuals selected for plant staff positions meet minimum selection criteria for technician positions as committed to in your FSAR, to prevent a general deterioration of the quality of your radiochemistry staff.

It is Region IV's position that 12 of the current radiochemistry technician staff do not meet the minimal experience recommendations of ANSI N18.1-1971 and should not function as radiochemistry technicians without the direct supervision of an ANSI qualified person. We would appreciate your expanding your response

to the Notice of Deviation to address your program for assuring adequate experience levels for radiochemistry technicians before they are permitted to function without the supervision of an ANSI N18.1-1971 qualified responsible radiochemistry technician or supervisor.

After we have evaluated your response to this letter, we will determine if further enforcement action is necessary to resolve this matter.

Sincerely,

Original Signed By

*R.P. Denise, for:*

E. H. Johnson, Acting Chief  
Reactor Project Branch 2

cc w/enclosure:

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bcc: DMB (IE06)

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RPB2

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G. Vissing, NRR

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ARKANSAS STATE DEPT. HEALTH

B. Nicholas