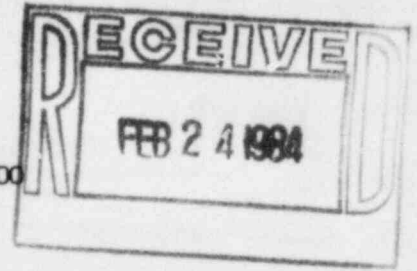




DmB

ARKANSAS POWER & LIGHT COMPANY
POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000
February 7, 1984



ØCANØ284Ø7

Mr. Richard P. Denise, Director
Division of Resident Reactor Projects
and Engineering Programs
U. S. Nuclear Regulatory Commission
Region IV
511 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
Inspection Report 50-313/83-26 and 50-368/83-26:
AP&L Response to Notice of Deviation Concerning
Radiochemistry Personnel Qualifications

Gentlemen:

The purpose of this letter is to respond to NRC's subject Inspection Report (ØCNA1283Ø8) dated December 9, 1983, and our subsequent December 22, 1983, commitment (ØCAN128311) to provide our response by February 7, 1984. Our written response to ØCNA1283Ø8 is enclosed.

Very truly yours,

John R. Marshall
John R. Marshall
Manager, Licensing

JRM:DET:s1

Enclosure

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PDR ADOCK 05000313
Q PDR

ENCLOSURE TO ØCANØ284Ø7

This enclosure provides AP&L's response to NRC's letter dated December 9, 1983, (ØCNA1283Ø8) which transmitted Inspection Report 50-313/83-26 and 50-368/83-26. Appendix A to ØCNA1283Ø8 contained a Notice of Deviation concerning Radiochemistry Technician Qualifications and requested AP&L's written response within 30 days. ØCAN128311 extended our response date to February 7, 1984.

The apparent deviation cited by NRC and AP&L's response follow:

- NRC NOTICE OF DEVIATION FROM ØCAN1283Ø8

Radiochemistry Technician Qualifications

Chapter 12, Section 12.1.3, "Qualifications," of Unit 1 FSAR and Chapter 13, Section 13.1.3, "Qualification Requirements for Nuclear Plant Personnel," of Unit 2 FSAR, states, "The education and experience of the plant operation, technical, and maintenance support personnel meet the requirements set forth in ANSI N18.1, dated March 8, 1971. Section 4.5.2 of ANSI N18.1.1971, "Technicians," specifies that, "Technicians in responsible positions shall have a minimum of two years of working experience in their specialty. These personnel should have a minimum of one year of related technical training in addition to their experience."

In deviation from the above, the NRC inspectors noted that 13 of the 16 radiochemistry technicians did not appear to meet the experience criteria for radiochemistry technicians in that they lacked the specified minimum of 2 years of working experience in their specialty (radiochemistry). Additionally, the licensee had not developed procedures which provide definitive selection and qualification criteria for hiring radiochemistry personnel.

- AP&L RESPONSE

ANSI N18.1, 1971, in Section 4.5.2 under "Technicians" states: "Technicians in responsible positions shall have a minimum of two years of working experience in their specialty. These personnel should have a minimum of one year of related technical training in addition to their experience."

The deviation cited by the NRC inspector stated "that 13 of the 16 radiochemistry technicians did not appear to meet the experience criteria."

Our interpretation of "responsible positions" is defined as relating to qualifications of persons in "journeymen level" positions with respect to pay, grade and work experience (two years experience required for radiochemistry journeyman level technicians). Further, a review of ANSI N3.1, 1981 Section 4.5 supports this position.

At the time of this inspection, September 19-23, 1983, there were four persons in radiochemistry in responsible positions as defined above. Each of these radiochemists had in excess of two years experience in radiochemistry at ANO. It does not appear we are in deviation of ANSI N18.1, 1971.

This must also have been the conclusion of another NRC inspector in a letter dated June 24, 1983, (ØCNAØ68317). Section 4 of NRC's Inspection Report 50-313/83-11 and 50-368/83-11 states in part: "The NRC inspector reviewed the qualifications and training of radiochemistry personnel to determine agreement with the recommendations of NRC Regulatory Guide 1.8 and ANSI N18.1, 1971... The selection and qualification criteria appeared to satisfy the recommendations of Regulatory Guide 1.8 and ANSI N18.1, 1971... No violations or deviations were identified."

The deviation also states that "the licensee had not developed procedures which provide definitive selection and qualification criteria for hiring radiochemistry personnel."

At the time of the inspection all 16 of the radiochemistry technicians had a college degree in science or a science related field. In addition, 11 of the 16 had attended a two week B&W Radiochemistry school. Radiochemistry personnel applicants are evaluated against written criteria to establish their qualifications. The criteria presently being used were established November 5, 1981. All personnel hired since that date were evaluated against that criteria.

Therefore, based on the above interpretation, it is AP&L's position that our Radiochemistry Technician Qualifications remain in compliance with the intent of our ANO-1&2 FSAR commitments.