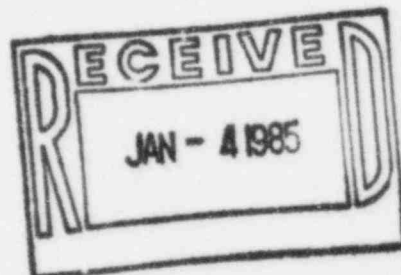




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December 27, 1984



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Mr. Richard P. Denise, 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
Response to Inspection Reports
50-313/84-29 and 50-368/84-29

Gentlemen:

The subject inspection reports have been reviewed. A response to the "Notice of Violation" is attached.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'J. Ted Enos'.

J. Ted Enos
Manager, Licensing

JTE:RJS:ds

Attachment

cc: Mr. Norman M. Haller, Director
Office of Management & Program Analysis
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Richard C. DeYoung
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, DC 20555

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NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of October 1-31, 1984, and in accordance with the NRC Enforcement Policy (10 CFR, Part 2, Appendix C), 47 FR 8583, dated March 8, 1984, the following violations were identified:

A. Failure to Maintain Cable Tray Installations as Required by Design Drawings (Units 1 and 2)

10 CFR Part 50, Appendix B, Criterion V required that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Electrical Drawings E-59 and E-2059, "Conduit and Cable Tray Notes and Details" state:

- All solid bottom instrument trays shall have covers for their full length.
- Solid covers shall be provided on vertical trays for a minimum of 6 feet above the floor level.
- Tray bottom covers shall be affixed flush to the outside of tray side rail.
- Tray top covers shall be held in place by means of stainless steel cover connection clips or equal.

Contrary to the above, cable tray installation for trays ER302, ER303, and FJ016 for Unit 1, and trays EB129, EC261, EC212, EJ210, CJ304, DC456, DC279, and EB129 for Unit 2 fail to meet one or more of the installation requirements stated above.

This is Severity Level IV Violation. (Supplement I) (313/8429-01; 368/8429-01)

RESPONSE

The cable trays identified by the inspector as having installation deficiencies were walked-down and job orders were issued for correcting the discrepancies between design requirements and actual installation. Repairs of the Unit 2 cable trays have been completed. Additional walk-downs of Unit 1 cable trays were performed to identify other cable tray cover deficiencies associated with the present refueling outage work activities.

Discrepancies noted by the inspector and the walk-down effort will be corrected by the end of the Unit 1 outage. A management directive was issued to maintenance supervision requiring implementation of practices to prevent further degradation resulting from maintenance activities. An evaluation of the requirements for cable tray covers has been conducted. Although the plant FSARs mention that solid covers are used where minimum separation distances for fire protection are not satisfied, the current Fire Hazards Analysis (OCAN08404) submitted to NRC in accordance with 10CFR 50.48 (Appendix R) takes no credit for the tray covers. Therefore, tray covers do not fulfill a safety function but should be maintained to facilitate good housekeeping. Housekeeping inspections in the future will increase the focus on cable tray covers to insure that they are promptly replaced following maintenance or modifications. We are presently in full compliance.

B. Failure to Adequately Maintain the Refueling Shuffle Procedure (Unit 1)

Technical Specification 6.8.1 states in part, "Written procedures shall be established, implemented, and maintained covering . . . Refueling Operations"

Procedure 1502.04, "Refueling Shuffle," has been established in accordance with this Technical Specification.

Technical Specification 3.8.7 states, "Isolation valves in lines containing automatic containment isolation valves shall be operable, or at least one shall be closed." This specification is applicable during refueling operations.

Contrary to the above, on October 31, 1984, the NRC inspector found that the licensee had issued a change to Procedure 1502.04 on October 28, 1984, adding the following note: "If one automatic isolation valve is failed open, the other valve in that line must be closed or capable of automatic actuation." In that this discrepancy was identified and corrected prior to commencement of refueling operations, Technical Specification 3.8.7 was not violated.

This is a Severity Level IV Violation. (Supplement I) (313/8429-04)

RESPONSE

The procedure discrepancy was corrected prior to commencement of refueling operations and full compliance has been achieved as noted in the violation. To prevent recurrence, an Operations Department directive was issued to all Senior Reactor Operators (SRO) who, by virtue of their SRO license, have interim approval authority for procedure changes. Procedure revisions to safety-related operating procedures are to be made using a temporary or permanent change only

when absolutely necessary to complete or allow a required operation or when the procedure is clearly in error, and only with concurrence of the Operations Manager, Operations Superintendent of the affected unit, or a permanent Operations Technical Staff SRO. Minor procedure discrepancies or desired improvements will be accomplished by revision which requires Plant Safety Committee and General Manager approval prior to implementation.

C. Failure to Adhere to the Requirements of the Refueling Shuffle Procedure (Unit 1)

Technical Specification 6.8.1 states, in part, "Written procedures shall be established, implemented, and maintained covering . . . Refueling Operations"

Procedure 1502.04, "Refueling Shuffle," has been established in accordance with this Technical Specification. Section 4.7 of this procedure states, "Access to the Reactor Building fuel handling area and elevations above and adjacent to the fuel transfer canal shall be limited to personnel required to support the refueling effort or maintenance of required systems. Measures shall be established to prevent loose objects or foreign material from entering the above clean area. Tools shall be secured by lanyards prior to entry into the clean area."

Contrary to the above, on October 31, 1984, the NRC inspectors found several loose objects and tools, including nuts, bolts, and a wrench on the fuel handling bridges.

This is a Severity Level V Violation. (Supplement I) (313/8429-05)

RESPONSE

Corrective action was taken by the Shift Supervisor on duty at the time the items were identified by the inspectors. The Unit 1 refueling Outage Manager and the Nuclear Support Supervisor ensured that the bridges were clear of all unsecured items during fuel movement. Full compliance was achieved immediately and maintained for the duration of the shuffle. Re-enforcement of the necessity of controlling loose material in the vicinity of the refueling canal will be emphasized with refueling personnel prior to fuel handling operations during future refueling outages.