



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUL 12 1984

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 NUCLEAR ONE -
UNIT 1 FROM JULY 1, 1983 TO JUNE 30, 1984 -
AEOD INPUT TO SALP REVIEW

In support of the ongoing SALP reviews, AEOD has reviewed the LERs for Arkansas Unit 1 during the subject period. AEOD's review focused on the clarity and adequacy of the descriptions provided in the individual LERs.

The licensee submitted 18 LERs during the assessed period. In general, the LERs were acceptable and reasonably detailed to permit understanding of the events. The enclosure provides additional observations from our review of the LERs.

If you have any questions, please contact either myself or Medhat El-Zeftawy of my staff on (FTS) 492-4434.

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

Enclosure:
As stated

cc: w/enclosure
G. Vissing, NRR

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SALP REVIEW FOR ARKANSAS - 1

The licensee submitted 18 LERs in the assessment period from July 1, 1983 to June 30, 1984. Based on our review, we have made the following observations and conclusions:

1. The information in the narrative sections was generally sufficient to provide the reader with a good understanding of the event.
2. There are no significant problems with the coded information provided by the licensee.
3. A total of 18 LERs were retrieved from our data base (not including the updated LERs) for events that were reported from July 1, 1983 to June 30, 1984. The descriptions of events were clear and adequate. The apparent cause of the occurrences was explained and documented. The corrective actions were also mentioned. The largest percentage (50%) of LERs submitted were attributed to component failures. A considerable percentage (22%) of the events were caused by personnel errors and procedural inadequacies. Sixteen percent (16%) of the events were due to pipe cracks. The remaining events were attributed to fire protection deficiencies and to "others" category.
4. Regarding updated LERs, the licensee submitted an updated LER 83-023/03X-6 as it was promised.
5. In many cases, the licensee referenced LERs pertaining to previous events of a similar nature. For example, in LER 83-017/03L, other previous similar events (LERs 78-005, 80-026, 80-034, and 82-012) were referenced.
6. Regarding multiple event reporting in a single LER, the events generally were combined correctly in accordance with the guidelines of NUREG-0161 (General Instruction #7).
7. Only two Preliminary Notifications (PNs) were issued in the SALP assessment period (PNO -IV-83-023, and 83-028). Both PNs were correctly further documented by LERs 83-017/03L and 83-019/01T, respectively.



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JUN 28 1984

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 NUCLEAR ONE - UNIT 2
FOR THE PERIOD FROM JULY 1, 1983 TO JUNE 30, 1984
AEOD INPUT TO SALP REVIEW

In support of the ongoing SALP reviews, AEOD has reviewed the LERs for Arkansas-2. Our review concentrated on LER form completeness and the clarity, understandability, and adequacy of the event report contents.

We concluded that the licensee provided adequate event reports during the 1983 assessment period. We noted a few minor deviations from the accepted reporting standards of NUREG-0161 and they are described in the enclosure.

The 1984 LERs were informative and complied with new LER reporting rules.

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. Mr. Cintula can be reached at FTS 492-4494.

Karl V. Seyfrit

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

Enclosure:
As stated

cc w/enclosure:
W. D. Johnson, R IV
R. Lee, NRR

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AEOD INPUT TO SALP REVIEW FOR ARKANSAS NUCLEAR ONE - UNIT 2

The Licensee submitted about 30 reports, plus updates, during the assessment period from July 1, 1983 to June 30, 1984. Our review included the following LER numbers:

83-029 to 83-050
84-001 to 84-010

The LER review followed the general instructions and procedures of NUREG-0161 and NUREG-1022. The specific review criteria and our findings follow:

1. LER Completeness

- a) Was the information sufficient to provide a good understanding of the event?

1983 LERs

The LERs provided sufficient information to provide a clear and adequate description of the occurrence, the direct consequences and the corrective action. The reports typically included specific details of the event such as the time of the event, duration of the event, valve identification numbers, model numbers, LCOs that were violated, etc., to provide a more complete understanding of the event.

However, when more space was needed to describe the occurrence than available in the free-form abstracts of the LER form, the licensee did not provide a complete abstract or a complete attachment to the LER. Instead, the licensee began the narrative in the space designated for the abstract and concluded the narrative with the attachment. This is inconsistent with NUREG-0161.

1984 LERs

The abstract described the major occurrences of the event, including all component or system failures that contributed to the event and significant corrective action taken or planned to prevent recurrence as stated in NUREG-1022.

- b) Were the LERs Coded Correctly?

1983 LERs

We checked the codes the licensee selected against the narrative description of the event for accuracy. We agreed with the

licensee's selection in all coded fields except for the occasional use of ZZZZZZ for component type that we felt should have been coded XXXXXX. This disagreement is minor and did not detract from an overall judicious selection of coded information.

1984 LERs

We agreed with the licensee's selection in all coded fields.

c) Was Supplemental Information Provided When Needed?

1983 LERs

All of the reports that were required to be reported immediately contained the mandatory supplemental information. However, as previously explained, the abstract and its related attachment could not separately stand alone as a complete descriptor of the event. The attachment was improperly used as a narrative extension of the abstract in LERS 83-030X1, 83-032, 83-035, 83-035X0, 83-036, 83-037, 83-038, 83-041, 83-042, 83-043, 83-044, 83-045 & Updates and 83-049.

1984 LERs

The text of the LER satisfied the requirements of NUREG-1022.

d) Follow-Up Reports

1983 LERs

The licensee promised to update two reports in this reporting period; one report has been received. A review of the data base shows many reports had been updated in the past. In addition, some reports were updated many times. There was no doubt that the licensee was very conscientious in the need for providing relevant updated information on the events. However, we did note the licensee did not identify the update report across the top of the LER form in accordance with NUREG-0161, Item 3 of the General Instructions, Page 6. Other than the proper identifier, the updated LERs contained new information and the LERs were updated correctly.

1984 LERs

No updated LERs have been received yet, so we have no basis for an assessment.

e) Were Similar Occurrences Properly Referenced?

1983 LERs

The licensee typically listed many previous similar and related events on the LER form. In addition, some LERs noted that no

similar occurrences had been reported. Only a few LERs did not provide an informative statement on the occurrence or lack of occurrence of previous similar events.

1984 LERs

The above comments are also applicable to the 1984 LERs.

2. Multiple Events Reporting in a Single LER

No reviewed LER contained information in a single LER that should have been reported with separate LERs.

3. Prompt Notification Follow-up Reports

Only two PNs were submitted in the assessment period. One PN was a reportable event and the licensee submitted an LER for this occurrence. The remaining PN was clearly unreportable. Simply not enough PNs were issued for us to determine if the licensee is reporting all events that are required to be reported.



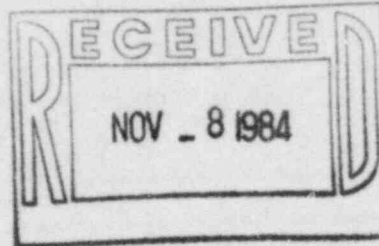
ARKANSAS POWER & LIGHT COMPANY

POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000

November 1, 1984

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Mr. Robert D. Martin
Regional Administrator
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
1984/1984 Systematic Assessment of
License Performance (SALP) Report

Gentlemen:

By letter dated September 10, 1984, (ØCN\Ø984Ø7), NRC transmitted the Systematic Assessment of Licensee Performance (SALP) report for Arkansas Nuclear One for the period July 1, 1983, through June 30, 1984. Subsequently, on September 25, 1984, 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.

As previously stated, AP&L has, and continues to support the SALP process and its goals and objectives. An objective assessment of Licensee performance is useful to both the Licensee and the NRC as well as increasing public confidence in the nuclear industry. Such a process promotes continued enhancements in safety and provides a tool which enables both the licensee and the 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 address both the strengths and weaknesses of each area evaluated.

The subject SALP report is evidence that the SALP process is working and improving. This report was indeed the most objective of any received to date with substantial recognition of positive areas as well as weaknesses. Although the recognition and focusing of resources on weaknesses is essential, recognition of accomplishments is also necessary and appropriate as it can be a boost to moral, and provide a positive incentive for future improvements.

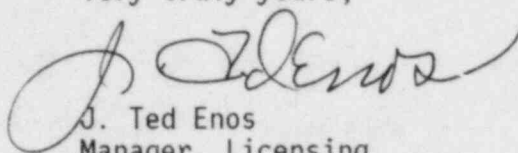
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November 1, 1984

AP&L places a great deal of importance on the SALP process and evaluation. Key elements are tracked and evaluated periodically to ensure improvement in identified weak areas as well as to assure performance does not degrade in strong areas. It has been, and remains, our goal to operate the ANO units in the safest possible manner. The SALP report and feedback is an important part of our process to meet this goal and will continue to receive high attention and impact on our activities.

Very truly yours,

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

J. Ted Enos
Manager, Licensing

JTE/ac

ATTENDANCE LIST - September 25, 1984 SALP Meeting

<u>Name</u>	<u>Title</u>	<u>Organization</u>
J. T. Collins	Regional Administrator	NRC
D. R. Hunter	Chief, Project Branch 2	NRC
R. E. Hall	Chief, Engineering Preparedness and Radiation Protection Branch	NRC
W. D. Johnson	Senior Resident Inspector	NRC
M. E. Murphy	Reactor Inspector	NRC
G. S. Vissing	Project Manager, ANO-1	NRC/NRR
R. S. Lee	Project Manager, ANO-2	NRC/NRR
J. M. Griffin	Senior Vice President - Energy Supply	AP&L
J. M. Levine	General Manager, ANO	AP&L
J. R. Marshall	Project Manager, ANO	AP&L
L. J. Duggar	Consultant, ANO Project Manager	AP&L
L. W. Humphrey	Administrative Manager	AP&L
T. H. Cogburn	ANO Special Projects Manager	AP&L
D. Dow	Manager, Nuclear Services	AP&L
G. W. Muench	Vice President - Nuclear Assurance	MSS
B. Morehead	Director, Energy Supply Services	AP&L
C. Dunn	Manager, Corporate Security	AP&L
E. P. McGlahflin	Director, Corporate Services	AP&L
E. C. Ewing	Manager, Engineering and Technical Support	AP&L
D. R. Sikes	General Manager, Engineering Services	AP&L
J. T. Enos	Licensing Supervisor	AP&L
D. Howard	Licensing Supervisor	AP&L
R. Tucker	Electrical Maintenance Superintendent	AP&L
J. G. Waxenfelter	Shift Maintenance Superintendent	AP&L
P. Jones	J&C Superintendent	AP&L
V. Peters	Mechanical Maintenance Superintendent	AP&L
E. L. Sanders	Maintenance Manager	AP&L
L. W. Schempp	Manager, Nuclear Quality Control	AP&L
D. G. Horton	Manager, Quality Assurance	AP&L
B. A. Baker	Operations Manager, ANO	AP&L

ERRATA SHEET

NRC SALP Report 50-313/84-24; 50-368/84-24

Cover Letter

- Paragraph 1, line 3: Change "evalute" to "evaluate"
- Paragraph 2, line 1; Change "evaluted" to "evaluated"

Appendix

- Page 4, paragraph IV, A.3.a, line 2; Change "basis" to "basic"
- Page 13, paragraph IV. D.1, line 26; Change "casually" to "causally"
- Page 17, paragraph IV.E.1. line 5; Change "Idenficiation" to "Identification"
- Page 21, paragraph IV.G.1, line 10: Change "times" to "items"
- Page 24, paragraph IV.J.1, line 28: Change "license" to "licensee"
- Page 27, paragraph IV.K.3.b, line 1: Change "large" to "larger"
- Page 28, paragraph Iv.L.1, line 2: Change "were" to "was"
- Page 29, paragraph IV.L.1, line 14: Change "concerned" to "concerted"
- Page 29, paragraph IV.L.1, line 18: Change "casually" to "causally"