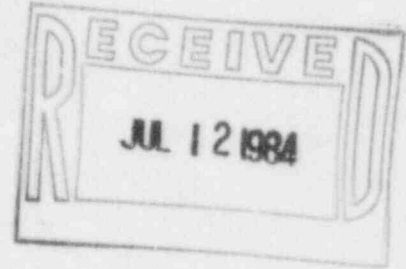




ARKANSAS POWER & LIGHT COMPANY

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July 6, 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
50-313/84-15 and 50-368/84-15

Gentlemen:

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

Very truly yours,

John R. Marshall
Manager, Licensing

JRM:RJS:ac

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 May 14-18, 1984, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following violation was identified:

Failure To Provide Adequate Design Control Measures

10 CFR Part 50, Appendix B, Criterion III, states in part: "The design control measures shall provide for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program. . . . Design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design. . . ."

Arkansas Power and Light Company Quality Assurance Program for Operations, TOP-1A, Revision 5, dated October 10, 1980, invokes ANSI N45.2.11-1974. ANSI N45.2.11-1974, states in part: "Measures shall be applied to verify the adequacy of design. . . . The results of design verification efforts shall be clearly documented, with the identification of the verifier clearly indicated thereon, and filed. . . . The responsible design organization shall identify and document the particular design verification methods to be used."

Contrary to the above, administrative procedures for the control of design changes do not provide the necessary instructions to satisfy these specific requirements.

This is a Severity Level IV Violation. (Supplement ID)
(50-313/8415-01; 50-368/8415-01)

Response

ANSI N45.2.11-1974, paragraph 6.3, states the following:

"The responsible design organization shall identify and document the particular design verification methods to be used. Acceptable verification methods include but are not limited to:

1. Design reviews
2. Alternate calculations
3. Qualification testing "

After reviewing the violation, ANSI N45.2.11 and ANO administrative procedures AP&L has concluded that administrative procedure 1032.01, Design Control, as currently written, provides for design verification

by the design review method. Guidelines for this review technique are provided in paragraph 6.2.11 of procedure 1032.01 and include: 1) verification that the items specified in the Design Evaluation Questions (Attachment 3 of 1032.01) have been properly addressed; 2) verification of completeness; and 3) verification of technical accuracy. Design Evaluation Questions are based on guidelines provided in ANSI N45.2.11-1974, paragraphs 3.2 and 6.3.1. Those items not specifically conveyed as questions are inherently addressed in the process of responding to the question set or in the verification of completeness and technical accuracy in the review process. This design verification method is specified for all DCFs by the Design Control procedure. The independent reviewer's signature signifies that an independent design review as specified in the procedure was performed. Design verification by other means such as alternate calculations or qualification testing is supplemental to the design review process. Since guidelines currently exist to verify the adequacy of designs in accordance with ANSI N45.2.11-1974 and 10 CFR Part 50 Appendix B, it is not clear that procedural changes to address this aspect are necessary.

However, as indicated in the violation, there does appear to be a weakness in ANO design control procedures regarding documentation of the results of design verification efforts. Specifically our review indicates that more detailed guidance and documentation of the independent review process are in order. Presently, a Design Process Review by an AP&L task force is underway which is expected to result in several changes in the AP&L design change process. A thorough evaluation of the requirements and desired results of the independent review phase of the design process is being included in this project. For the interim period, prior to completion of the Design Process Review, ANO administrative procedure(s) for the control of design changes, will be modified to provide more detailed instructions to improve the consistency and documentation of the independent review. It is anticipated that the necessary changes can be implemented by September 14, 1984.