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May 27, 1985

1CAN058506

Director of Nuclear Reactor Regulation
ATTN: Mr. J. F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Arkansas Nuclear One - Unit 1
Docket No. 50-313
License No. DPR-51
Generic Letter 83-28
Items 2.1.1, 2.1.2, 2.2.1, 4.4 and 4.5.3

Gentlemen:

In response to your letter dated March 11, 1985 (1CNA038504) the following information is provided.

Item 2.1.1 - Incomplete

Licensee must supply a statement confirming that reactor trip system components were reviewed and that they are identified as safety-related on documents, procedures and information handling systems.

Response: Our original response to this item indicated we had received a generic component listing of safety related Reactor Trip System (RTS) components from the B&W Owners Group (BWOOG) and that we were cross relating this generic list to plant specific components. This effort is now complete and a plant specific listing of RTS safety related components has been developed. After development of the list, a review was conducted to verify that procedures utilized for the identified components were classified as safety related. This effort is complete with satisfactory results. No procedure changes were identified as necessary as a result of this review.

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Item 2.1.2 - Incomplete

Licensee needs to supply detailed information describing his vendor interface program for reactor trip system components. Information supplied should state how the program assures that vendor technical information is kept complete, current and controlled throughout the life of the plant and should also indicate how the program will be implemented at ANO-1.

Response: Our original response to this item discussed our means of controlling, reviewing, and incorporation of vendor information. This program is procedurally implemented.

In addition to this program, AP&L is in the process of further enhancing our controls of vendor manuals. The new program will address vendor manuals and other available technical data for the reactor trip components.

The first phase of this program, which identified safety-related plant component vendor manuals at ANO, has been completed. The next phase of the program, currently beginning, will include a review of the components. Once this is accomplished available pertinent technical information will be assembled and reviewed for applicability to the ANO specific components. This information will be used to update the technical manuals.

Upon completion of this effort the technical manuals for safety-related equipment will be treated as controlled documents for the life of the plant, and industry and vendor initiated technical information which is continuingly applicable to ANO specific equipment will be incorporated into or referenced in the vendor manuals.

Item 2.2.1

Licensee needs to supply detailed information on how equipment will be classified as safety-related and will be designated as such on plant documentation as requested in sub-item 2.2.1.1.

Response: AP&L currently has a system level Q list as described in the original response to item 2.1. The terms Safety Related and Q are used synonymously when referring to components and are defined as those structures, systems and components which are relied upon to remain functional during and following design base events to ensure: (1) the integrity of the reactor coolant boundary, (2) the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposures comparable to the guidelines of 10CFR Part 100.

Since the current Q list is a system level list, components within the boundaries of a safety related (Q listed) system are treated as safety related unless specifically exempted using the process presented in Attachment 12 of our original response.

Plant instructions and procedures which, when implemented, have a potential for direct and immediate impact upon safety related systems, are marked or identified as "Safety Related."

AP&L is developing a component level listing of Safety Related (Q) equipment. This activity involves reconfirmation of the boundaries of safety related systems, then determination at the component level of whether or not the individual component is safety related. The criteria used in making the safety related (Q) determination is the basic criteria presented above.

The component level Q-list will be loaded into a computerized equipment database. Upon completion of the Q-list, changes to the list will be controlled via the design change process and subjected to required reviews for that process. Such changes to the list will be filed in the nuclear records management system.

When the component level Q-list information is loaded into the computerized system, job orders written for maintenance of a specific component will have the component automatically identified as "Q" (safety related) on the job order.

Item 2.2.2 - Incomplete

Licensee needs to present his evaluation of NUTAC program and describe how it will be implemented at ANO-1. The staff found the NUTAC program fails to address the concern about establishing and maintaining an interface between all vendors and safety-related equipment and the utility. Accordingly, the licensee will need to supplement his response to address this concern. This additional information should describe how current procedures will be modified and new ones initiated to meet each element of the Item 2.2.2 concern.

Response: AP&L participated in the development of the NUTAC program and believes that this program is responsive to the concerns of the Salem event and this item.

AP&L has evaluated the utility implementation responsibilities outlines in Section 4.1.1.1 of the March, 1984 NUTAC program and has concluded that current AP&L practices, together with future planned activities under the ongoing vendor manual review program, adequately implement these recommendations.

The review of safety related technical manuals will follow closely behind the equipment classification program described in the response to item 2.2.1. In order to ensure that adequate preventive maintenance is incorporated in our procedures, vendor technical information for safety related equipment will be reviewed and, if appropriate, incorporated into the ANO preventive maintenance program.

Item 4.4 - Incomplete

Licensee needs to provide detailed information on how the safety-related test and maintenance procedures for the SCRs will be implemented at ANO-1.

Response: The B&W Owners Group (BWO) response to this item dated November 5, 1983 describes the program for surveillance of SCRs. With the exception of verification that the SCRs degate when power is removed, this program has been conducted using safety related procedures since beginning of operation of ANO-1. Verification of degating was added to the existing safety related procedures on February 29, 1984 assuring that the ANO-1 procedures comply with the BWO guidelines.

This information was also documented in the April 27, 1984 BWO submittal (Mr. J. Ted Enos to Mr. Prasad Kodambi).

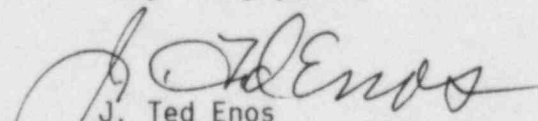
Maintenance on the SCRs is performed using Job Orders. Provisions are now being made to assure Job Orders involving the SCRs indicate appropriate quality requirements.

Item 4.5.3 - Incomplete

Licensee needs to supply detailed information on Owners Group Analysis Program for considering the concerns of 4.5.3.1 to 4.5.3.5 in the generic letter. Plant specific concerns relating to implementation of results of the Owner's Group program need also to be addressed by your response.

Response: Please see the BWO Amendment 1 response to G.L. 83-28 dated April 8, 1985, (Mr. J. Ted Enos to Mr. Hugh Thompson). This response is applicable to ANO-1.

Very truly yours,


J. Ted Enos
Manager, Licensing

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