



Entergy Operations

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September 3, 1992

OCANO 202

U. S. Nuclear Regulatory Commission
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Washington, DC 20555

Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 & 50-368
License Nos. DPR-51 & NPF-6
Update on Status of Historical Commitments

Gentlemen:

Entergy Operations, Inc., has previously discussed plans to extract and status past commitments in Arkansas Nuclear One (ANO) correspondence. To date, approximately three (3) years of correspondence has been reviewed regarding commitments. Based on the statusing effort, the enclosed information communicates commitment changes resulting from our Historical Review Project (HRP).

The ANO HRP is reviewing past correspondence submitted to the NRC. The purpose of this review is to identify commitments submitted, document their status, and record the information in the Commitment Management System (CMS) database for future reference. During this effort, commitments or other information had been identified for which ANO's docketed position requires clarification/change. Guidelines are in place to assure changes to commitments identified during the HRP are considered for any safety significant implications. The commitment changes identified in this report were reviewed against the guidelines and were not considered to have any significant safety implications.

Three items have been identified for which the docket is being updated. We are in compliance with the intent of two of the original commitments. The third commitment has been rendered unnecessary by ANO. As discussed with Mr. Chris Kennedy of the Region IV staff, this commitment is being rescinded. No action is being requested by the NRC on these items.

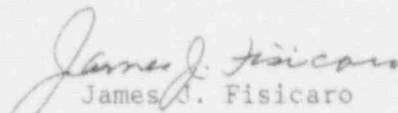
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Should you have any questions, please contact me at (501) 964-8601.

Very truly yours,


James J. Fisicaro
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JJF/KJM/nmg
enclosures

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Commitment To Submit Corrected Information For
NUREG-0737 II.D.1 Analysis

2CAN078803 (dated 7/05/88) committed to review NUREG-0737 Item II.D.1 submittal on relief and safety valve testing dated 5/7/85 (OCAN058505) and "resubmit the corrected information in a separate response." This review was requested in light of a problem discovered on another submittal and due to a change in the input data for the submittal analysis between ANO Unit 2 cycles 2 and 3.

The reevaluation was performed and submitted to Licensing concluding the original submittal, OCAN058505, was accurate as submitted and required no correction. Individuals involved at the time recall the NRC being notified via telephone that no submittal would be necessary; however, no documentation to this effect could be located. No correspondence was generated by ANO to satisfy the submittal commitment.

NUREG-0737 Item II.D.1 (TAC 44561) was closed for ANO Unit 2 in correspondence dated 6-1-89 (2CAN068901). We do not consider any further action to be necessary on this commitment.

Commitment To Have Combustion Engineering (CE) Submit Quality Assurance
Plan To ANO Prior To Future On-Site Contracts

Licensee Event Report No. 50-368/87-006-01 (2CAN068810), was submitted due to an unisolable reactor coolant system boundary leak caused by the failure to identify a defective seal weld made during pressurizer repairs. As part of the corrective action, ANO committed to annotate the Qualified Vendor List (QVL) to "require that a [vendor] QA plan is submitted to QA prior to start of work on future [CE] contracts." This would permit ANO to insert appropriate QA requirements or hold points.

The QVL was annotated as committed June 1988 and the commitment remained in place as long as the QVL existed. In February of this year, the ANO QVL was superseded by the Corporate Quality Supplier List (QSL). During the transition from QVL to QSL the subject commitment was inadvertently omitted. It was reinstated in the QSL June 19, 1992, upon discovery of the error. The intent of the commitment was still met in the interim, however, by requirements which were placed in the ANO Contract Administration Procedure November 27, 1991. This procedure instituted the same requirements for all contractors performing work on site as had been committed for CE, i.e., submittal of a vendor QA plan prior to beginning work on site.

ANO procedures will continue to require CE to submit their QA plan to ANO prior to starting work on site. We believe it is more appropriate to implement this commitment in site documents than in the Corporate QSL.

Commitment For Operations To Record HPI Line Temperatures On
A Daily Basis

ANO-1 is currently committed to recording High Pressure Injection (HPI) line temperatures on a daily basis per 1CAN059202, which states, "... operations logs procedure requires recording temperature readings daily from the remote indicator, not once per shift from the local indicators." 1CAN059202 described modifications to commitments which were no longer needed due to changes in the configuration of the HPI system and the installation of additional instrumentation.

The basis for the original commitment to log HPI line temperatures was to monitor for backleakage of the Reactor Coolant System (RCS) into the HPI piping. Subsequent removal of the HPI crossover lines, as described in 1CAN059202, eliminated the only credible flow path for such backleakage and in doing so removed the basis for Operations' commitment to log HPI line temperatures. In the extremely unlikely event of simultaneous failure of redundant check valves and leakage through normally closed MOV's, the control room has an annunciator to alert the operators of high HPI line temperature. Therefore after further review, ANO is rescinding our commitment for ANO-1 Operations to log the HPI line temperature from the remote indicator.