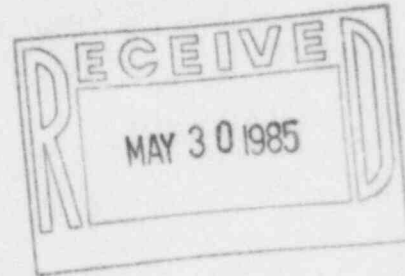




ARKANSAS POWER & LIGHT COMPANY

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May 23, 1985



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Mr. Richard P. Denise, Director
Division of Reactor Safety and Projects
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
50-313/85-06 & 50-368/85-06

Gentlemen:

The subject inspection reports have been reviewed. Responses to the Notice of Violation and Notice of Deviation are attached.

Very truly yours,

J. Ted Enos
J. Ted Enos
Manager, Licensing

JTE:RJS:ds

Attachment

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

Mr. Norman M. Haller, Director
Office of Management & Program Analysis
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 March 1-31, 1985, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following violations were identified:

1. Failure to Follow Requirements of a Quality Assurance Administrative Procedure (Units 1 and 2)

10 CFR Part 50, Appendix B, Criterion V and Section 5.1.1 of the Arkansas Power & Light Quality Assurance Manual-Operation (APL-TOP-1A) require 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 procedures, instructions, and drawings.

Quality Assurance Administrative Procedure QAA-8, Vendor Qualification Program, "has been established in accordance with Criterion V and APL-TOP-1A.

Section 5.1.2 of Procedure QAA-8 requires that the supporting documentation used in the evaluation of a vendor for inclusion on the qualified vendors list (QVL) be presented to the Quality Assurance (QA) manager for review and acceptance signature. This signature constitutes authorization to place or continue a vendor on the QVL.

Contrary to the above, an update to the QVL was issued on February 22, 1985, to place or continue vendors on the QVL without a review and acceptance signature by the QA manager.

This is a Severity Level V Violation. (Supplement I.E) (313/8506-01; 368/8506-01)

Response

Contrary to existing procedures, the QVL update was inadvertently issued without the QA Manager's signature. Subsequent to the update cited in the response, a revised QVL has been issued with the appropriate signatures. Therefore we are now in full compliance. A review of previous QVLs and QVL Updates issued in 1983, 1984, and 1985 showed that QA Manager approval was obtained, as required, in all cases except the one noted. Accordingly, this is considered to be an isolated incident which is not indicative of a programmatic problem. Individuals responsible for QVL issuance have been advised of the importance of procedural compliance for assurance that there is no recurrence.

2. Failure to Follow a Quality Assurance Procedure (Units 1 and 2)

Criterion V of 10 CFR part 50, Appendix B requires 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 procedures, instructions, and drawings.

The AP&L Quality Assurance Manual-Operations (APL-TOP-1A) states that one method that may be used to evaluate and place contractors on the QVL is by verification that a contractor is a holder of an NRC letter confirming QA program implementation.

Contrary to the above, five contractors were listed on the QVL by being qualified as a holder of an NRC letter, yet the NRC letter for the five contractors had expired.

This is a Severity Level IV Violation. (Supplement I.D) (313/8506-02; 368/8506-02)

Response

The cause of this violation was determined to be that personnel responsible for maintenance of the QVL were unaware that the format of NRC vendor approval letters had changed to include an expiration date. In addition no mechanism existed to ensure the review of qualification basis documents on a regular basis to identify such changes.

The Qualified Vendors List revision dated March 21, 1985, included expiration dates for vendors qualified via NRC letters. The vendors whose NRC qualification have expired have either been listed with applicable expiration dates or have been requalified via other methods. Further, a review was made of other source documentation utilized for vendor qualification to ascertain that no similar problem exists with any other source. All other source documents utilized for vendor qualification provide for expiration dates to be specified; i.e. CASE audits, three (3) years from date of audit; ASME certification, expiration date included in ASME listing; AP&L or other source audit, two (2) years from date of audit. It is felt from this review that the discrepancy noted is therefore not common to other qualification methods utilized. To prevent recurrence of this and similar discrepancies in the future, Quality Assurance Administrative Procedure QAA-8, "Vendor Qualification Program", has been revised, in part, as follows:

- Revised paragraph 5.1.5.3 to indicate the three (3) year limitation on NRC letter quality vendors.
- Added section 5.3, "Annual Vendor Evaluation".

These actions are felt necessary to assure that the identified discrepancy does not recur and that a mechanism be provided to review vendor qualification basis documents on a regular basis to identify changes which may have occurred since the vendor was placed on the QVL.

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted during the period of March 1-31, 1985, and in accordance with NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following deviations were identified.

1. Failure to Meet a Commitment Relative to Distribution of Controlled Documents (Units 1 and 2)

By letters dated September 20 and November 23, 1983, in response to a Notice of Violation dated August 19, 1983, (313/8317-01; 368/8317-01), the licensee committed to establish a document distribution system at the Little Rock General Offices to ensure manuals used in quality-related activities were maintained in an up-to-date status.

In deviation from the above, the NRC inspector found, in a random sampling, that six manuals were not up-to-date in that the manuals contained superseded documents. (313/8506-03; 368/8506-03)

Response

As noted in the details of the NRC inspection report (paragraph 2.b.) corrective action was taken during the inspection period to verify that all manuals within the LRG0 were up-to-date. A reminder notice was also sent to manual holders outside the LRG0 to update their manuals. We have subsequently verified that those manuals are also current. Thus, we are now in compliance.

To prevent recurrence the Procedures Analyst has been counseled regarding the need to review procedure logs and to issue reminder notices within 45 days after procedure issuance. A suspense file system has been established to support this requirement. Furthermore, as noted in the inspection report details, memoranda were issued to Energy Supply management personnel stressing the importance of maintaining current procedure revisions and their responsibilities in reminding their staff of these requirements.

2. Failure to Meet a Commitment Relative to Design Change Control Activities (Units 1 and 2)

In a letter dated September 20, 1983, in response to a Notice of Violation dated August 19, 1983 (313/8317-01; 368/8317-01), the licensee stated that the requirement for the use of conversation memoranda would be deleted from Procedure ESP-201, "Design Change Package Control," to ensure consistency between the Little Rock General Offices and onsite procedures.

In deviation from the above, the licensee has not deleted the requirement for use of conversation memoranda from ESP-201. (313/8506-04; 368/8506-04)

The original violation concerned the failure to consistently prepare conversation memoranda (as required by Energy Supply procedures) documenting the interface between ANO engineering and General Office engineering staffs relative to field changes to design change packages. Initial review of this item resulted in a decision to delete the requirement for such conversation memoranda and this decision was communicated to personnel responsible for preparing the response to the Notice of Violation. It was later determined to be more appropriate to strengthen, rather than delete, the procedural requirement for conversation memoranda. The subsequent formal transmittal of the proposed response to the AP&L Licensing Section was accomplished via a reply to a Licensing Information Request (LIR). The LIR response was, however, not sufficiently detailed to identify the change in plans and was misinterpreted by AP&L Licensing personnel. The resulting NRC response reflected the originally proposed action. Final close out of this commitment was based on the issuance of the revised procedure. The content of the revised procedure was not, however, reviewed in detail by Licensing personnel and the discrepancy between the commitment and procedure content was not noted. The cause of this deviation was inadequate detail in internal communication of proposed corrective actions and a lack of detailed review of the revised procedure prior to final close out of the NRC commitment.

In order to prevent recurrence, the circumstances of this incident were reviewed with the personnel involved. Specifically, Licensing personnel were reminded of the need to thoroughly assure adequate commitment completion prior to close out (e.g. by use of "follow-up" LIRs) and Engineering Services management personnel were cautioned to be more specific in LIR responses.

Although the procedure revision was not consistent with that proposed in the response to the notice of violation we feel that the original concern is adequately addressed by the current procedure and no further changes are planned.