



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

50-313

JUL 24 1985

MEMORANDUM FOR: Mr. Eric Johnson, Chief  
 Reactor Projects Branch  
 Division of Reactor Safety & Projects  
 Region IV

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

SUBJECT: AEOD INPUT TO SALP REVIEW OF ARKANSAS NUCLEAR ONE,  
 UNIT 1 FROM JULY 1, 1984 TO JUNE 30, 1985

In support of the ongoing SALP reviews, AEOD has reviewed LERs for ANO Unit 1 submitted during the assessment period. Our review focused on the clarity and completeness of the event descriptions, identification of root causes and long-term corrective actions. We also evaluated these LERs in view of proper coding of the LER forms. In our data base, we found six LERs for 1984 and five for 1985. Only two of the 1984 LERs fall within this assessment period. Thus, a total of seven LERs were used in our review. Generally, the LERs were found to be inadequate. Most LERs did not contain sufficient descriptions of the events. In the enclosure to this memo, we have provided specific observations made from our review of the ANO-1 LERs.

If you any questions, please call me or Raji Tripathi of my staff on FTS 492-4435.

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

Enclosure:  
 As stated

cc: w/enclosure  
 G. Vissing

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SALP REVIEW FOR ANO-1

In the assessment period, the licensee submitted two LERs for 1984 and six for 1985. LER 85-005-00 could not be found in our data base. Our LER review was conducted following the instructions and procedures of NUREG-1022. Based on our examination of these seven LERS, we have made the following observations:

1. The information in the narrative sections was barely sufficient to provide the reader with a good understanding of the events. With exception of LERs 84-006-00 and 85-001-00, generally, there was insufficient information regarding the development of the event (information relating to when symptoms first appeared and how long they lasted were not always included in the LERs). We note that LERs 84-005-00, 85-002-00, 85-003-00 and 85-006-00 only contain the abstract of the relevant events without an accompanying text. We believe that appropriate details should be included in the text to enable the reader to fully understand the sequence of event(s). Submittal of an LER without a text is acceptable (LER 85-006-00), however, such submittals should have abstracts which provide all information required by 10 CFR 50.73 and NUREG-1022, and still be limited to 1400 words. If limits on the abstract preclude complete description of the event as required, then the abstract should not be regarded as a substitute for the text.
2. There are no significant problems with the coded information on the LER forms provided by the licensee, however, the Energy Industry Identification System identifiers were not included (for example, LERs 84-005-00 and 84-006-00).
3. In LER 85-002-00, it is the redundant flow instrument in the MFW train 'A' that was isolated and not the redundant MFW train. We contacted the licensee about the confusion this had raised and we understand that a revision to this LER will be submitted to clarify this issue.
4. In some LERs, the initial plant conditions are not explicitly mentioned in the event description, for example, LERs 85-001-00 and 85-006-00. In other cases, the time of onset of an event and/or the duration of an event - from the discovery of the problem until the implementation of the corrective measures - are not addressed. Examples are: LERs 84-005-00, 85-002-00, 85-003-00, 85-004-00, and 85-006-00.
5. Root causes are not always identified, e.g., LER 84-006-00.
6. Safety significance of an event is not always included in the LER, e.g., LERs 84-005-00 and 85-004-00.
7. After discovery of human error, no effort seems to be made by the licensee regarding personnel counseling, procedure modification, etc. to prevent recurrence, for example, LER 85-002-00.

8. In some LERs, the time elapsed between the event date and the report date exceeded the 30-day limit, e.g., LERs 84-U06-00, 85-001-00, and 85-004-00.
9. In some cases, the licensee did not indicate if there were any previous similar occurrences and/or did not provide long-term corrective actions, e.g., LERs 85-002-00, 85-003-00 and 85-004-00.
10. There were no Preliminary Notifications issued during the SALP assessment period.

Based on our review of these LERs, we find that the licensee does not prepare LERs in sufficient detail to meet the requirements of NUREG-1022. Improvements are needed in the areas identified above.