



ARKANSAS POWER & LIGHT COMPANY

December 31, 1987

ØCAN1287Ø6

L. J. Callan, Director
Division of Reactor Projects
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

SUBJECT: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313/50-368
License No. DPR-51 and NPF-6
Response to Inspection Report
50-313/8732 and 50-368/8732

Dear Mr. Callan:

Pursuant to the provisions of 10CFR2.201, a response to the violation identified in the subject inspection report is submitted.

Sincerely,

J. M. Levine
Executive Director,
ANO Site Operations

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cc w/att: U. S. Nuclear Regulatory Commission
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IC-88-003

NOTICE OF VIOLATION

Failure to Include the Provisions of an Order for Modification of License and the Accompanying Technical Evaluation Report in the Development of a Procedure:

Units 1 and 2 Technical Specification 6.8.1 requires, in part, that written procedures be established, implemented, and maintained for surveillance and test activities of safety-related equipment.

The Technical Evaluation Report section of the Order for Modification of License Concerning Primary Coolant System Pressure Isolation Valves, issued for both units on April 20, 1981, requires the incorporation of specified hydrostatic pressure criteria in the development of procedures for periodic valve leakage testing.

Contrary to the above, it was found on September 16, 1987, that Unit 1 Procedure No. 1102.01, Revision 28 and Unit 2 Procedure 2102.01, Revision 26, both utilized for the surveillance testing of reactor coolant system/low pressure injection system interface check valves failed to include the hydrostatic pressure criteria in the development of procedures for periodic valve leakage testing as specified in the Order for Modification of License Concerning Primary Coolant System Pressure Isolation Valves issued for both units on April 20, 1981.

This is a Severity Level IV violation. (Supplement I)(313/8732-03; 368/8732-02)

Response to Violation 313/8732-04, 368/8732-02

(1) The reason for the violation if admitted:

AP&L agrees that the ANO-1 and ANO-2 plant operating procedures for surveillance testing of reactor coolant system/low pressure injection system interface check valves failed to include pressure adjustment criteria as required in the Orders for Modification of License dated April 20, 1981 (1CNA048106 and 2CNA048106).

The orders issued technical specifications for both units which required the monitoring of leakage through these valves to demonstrate valve operability. The leakage monitoring requirements of the surveillances were incorporated into the plant preheatup and precritical checklist procedures for both units. The method to monitor leakage is to observe pressure indications on the low pressure side of the valves. Only if the pressure is above prescribed values is a leakage rate determination required. Monitoring and leakage rate determinations were to be performed with reactor coolant system pressure greater than 800 psi.

Testing at greater than 800 psi ensured that the surveillances were performed with a minimum test differential across the valves of 150 psid, as specifically required by the technical specifications. However, the procedures did not include leakage rate adjustments to account for conducting the surveillance at pressure differentials lower than function maximum pressure differentials, i.e., with the RCS not at normal operating pressure. This criteria was included in section 2.2.2, Hydrostatic Pressure Criteria, of the Technical Evaluation Reports attached to the orders. The leakage adjustment criteria was not included in the technical specifications or bases.

As a result, during procedure development, review, and approval, conformance with the technical specifications was ensured. However, conformance was not ensured with the supporting documentation for the order which, atypically, included additional specific criteria for monitoring which was not delineated in the technical specifications.

(2) The corrective steps that have been taken and the results achieved:

Past performance of the valve surveillances were reviewed for both units to determine if previous leakage rate determinations would have been outside the limits of the technical specifications if adjusted to function maximum pressure differential. For those surveillances which indicated some amount of leakage, the adjustment criteria was applied to correct the measured value. No adjusted leakage was identified which was outside the acceptable technical specification limits.

ANO-2 procedure revisions incorporating the hydrostatic pressure criteria of the Technical Evaluation Report are complete. The surveillance will now be performed with RCS pressure at the maximum normal operating pressure of 2250 psia. This negates the need for a leakage adjustment of the first series check valves which will be at the maximum pressure differential. An adjustment for leakage of the second series check valves, which will not normally be at the maximum pressure differential, is now included in the procedure.

The procedure revisions for ANO-1 have been initiated and should be completed by January 31, 1988.

(3) The corrective steps that will be taken to avoid further violations:

AP&L does not believe that the violation reflects on current processes for implementation of technical specification amendments.

Subsequent to the issuance of the order, a procedure on processing technical specification changes was developed. The original procedure was effective March 12, 1983. This procedure delineates the responsibilities and processing for incorporating technical specification amendment into plant procedures. This process has been further augmented by the creation of a Plant Licensing Group in 1984, which provides a focal point for license amendments, and for review of completeness and proper implementation of the changes.

Additionally, an extensive program to improve the 10CFR50.59 review process has been completed and implemented. Procedure changes require review by personnel who are trained and qualified to perform 10CFR50.59 reviews. Safety Evaluations, including TERs, would be thoroughly reviewed during this process to ensure that the procedures meet not only the technical specifications, but also the requirements of supporting documents providing the basis for the technical specifications. These are defined in the 10CFR50.59 program as Licensing Basis Documents. The program was described in our response to violation 50-313/8621-01, dated September 10, 1986 (ØCANØ986Ø5).

Based on these programmatic improvements, no further actions to prevent recurrence are deemed necessary.

(4) The date when full compliance will be achieved:

Upon issuance of the revised ANO-1 procedure by January 31, 1988, full compliance will be achieved.