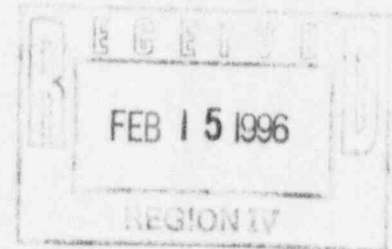


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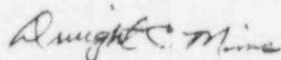
U. S. Nuclear Regulatory Commission
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Washington, DC 20555Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Response To Inspection Report
50-313/95-09; 50-368/95-09

Gentlemen:

Pursuant to the provisions of 10CFR 2.201, attached is the response to the notice of violation identified during the inspection activities associated with the connection of drain hoses between the service water drain valves on the Unit 2 Shutdown Cooling Heat Exchangers 2E-35A & B.

Should you have any questions or comments, please call me at 501-858-4601.

Very truly yours,

Dwight C. Mims
Director, Nuclear Safety

DCM/bws

Attachments

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NOTICE OF VIOLATION

During an NRC inspection conducted on October 29 through December 9, 1995, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995) the violation is listed below:

Unit 2 Technical Specification 6.8.1.a, states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.

Regulatory Guide 1.33, Revision 2 Appendix A, February 1978, Section 1.c, states, in part, that procedures should be written and implemented for equipment control. Licensee Procedure 1000.028, Revision 17, "Temporary Modification," governs the implementation of temporary changes to the facility. Paragraph 4.1 of Procedure 1000.028 defines a temporary modification as a temporary alteration made to plant equipment or a system that does not conform with approved drawings or other design documents.

Contrary to the above, on November 13, 1995, the inspectors identified that the licensee had provided the ability to interconnect the service water sides of Shutdown Cooling Heat Exchangers 2E-35A and -35B, a configuration that does not conform with approved drawings, without considering the temporary system as a temporary modification in accordance with Procedure 1000.028. As a result, a safety evaluation for the temporary system was not performed.

This is a Severity Level IV violation (Supplement I) (368/9509-01).

Response to Notice Of Violation 368/9509-01

(1) Reason for the violation:

Shutdown Cooling Heat Exchanger 2E-35B Service Water Inlet Isolation Valve, 2CV-1456-2 was discovered to be leaking past its seat during startup operation following Unit 2 Refueling Outage 2R11. Preparations to correct this condition required the drain down of the loop 2 service water system ESF header. If the header was drained to adjacent floor drains, a large volume of waste would be generated. Therefore, the draining was accomplished by connection of drain hoses and a pump from the shell drain of Shutdown Cooling Heat Exchanger 2E-35B to the shell drain connection of Shutdown Cooling Heat Exchanger 2E-35A. This allowed the water to be drained into the redundant service water header and not generate any waste.

Procedure 1000.028, *Temporary Modification Control*, revision 17, Step 2.2.5, states: "Temporary hoses and tubing attached to the system vents and drains to facilitate draining or venting, . . . are specifically excluded from the controls of this procedure". Step 4.11 of 1000.028, however, defines Mechanical Jumpers, which are not excluded from the controls of this procedure, as "temporary connections . . . that join two systems together or bypasses a component within a system, thus altering the system's design or configuration".

The failure of Step 2.2.5 of 1000.028 to be explicit in prohibiting the inter-connection of the vent and drain hoses to operable systems, led to the installation of the drain hoses without temporary modification controls or operations procedure controls being implemented. Either case would have required a 50.59 safety evaluation to be performed to address the evolution.

The draining of the shutdown cooling heat exchangers via inter-connection of the shell drains began in the mid 1980s and was a common practice as this method provided the cleanest and most expeditious method for draining the service water loops. Therefore, the reason for the violation was a lack of a questioning attitude of a long established practice and a lack of awareness that the inter-connection of the two systems met the definition of a temporary modification.

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

Upon identification of the non-compliance, work was stopped, appropriate drain hoses disconnected and the room secured.

Procedure 2104.029, *Service Water System Operation* was immediately revised to provide procedural controls for the service water loop draindown.

Procedure 1000.028 was revised to resolve the conflict between Steps 2.2.5 and 4.11, concerning the use of drain and vent connections.

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

The Units 1 and 2 Operations departments will review appropriate procedures and past work activities to identify other potential areas where procedure 1000.028 may have been misinterpreted by August 31, 1996.

The Units 1 and 2 Operations personnel will be provided training on the "lessons learned" from this event by April 30, 1996.

(4) Date when full compliance will be achieved:

Full compliance was achieved on November 13, 1995 when the drain hose connection between 2E-35A and 2E-35B was removed.