

ARKANSAS POWER & LIGHT COMPANY

April 4, 1988

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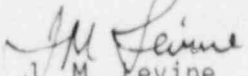
L. J. Callan, Director
Division of Reactor Projects
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

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
50-313/87-39 and 50-368/87-39

Dear Mr. Callan:

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

Very truly yours,


J. M. Levine
Executive Director,
Nuclear Operations

JML:DBL:djm
enclosure

cc w/att: U. S. Nuclear Regulatory Commission
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Washington, DC 20555

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Notice of Deviation

Based on the results of an NRC inspection conducted December 1, 1987, through January 19, 1988, a deviation of your commitments made to the NRC was identified. The deviation consisted of the failure to issue supplements to licensee event reports (LERs). In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C (1988), the deviation is listed below:

When LERs 85-001-00 and 86-001-00 for Unit 1 and 84-022-00, 85-002-00, 85-007-00, 86-012-00, and 86-014-00 for Unit 2 were issued by the licensee, the licensee stated in each listed LER that supplemental reports would be issued to provide the NRC with updated information on the event addressed by the LER.

In deviation from the above, the licensee failed to provide supplemental reports to the NRC. (313/87-39-01, 368/8739-01)

Response to Notice of Deviation 313-368/87-39-01

1. The Reason for the Deviation if Admitted.

Arkansas Power and Light concurs that an undesirable backlog of supplemental Licensee Event Reports (LERs) exists; as discussed further in this response actions are being taken to correct this condition. However, AP&L does not concur that this condition represents a deviation from a commitment made to the Nuclear Regulatory Commission.

NRC guidance related to the regulatory commitment status of LER supplemental report submission dates is contained in NUREG-1022, Supplement No. 1, "Licensee Event Report System." This NUREG contains a summary of questions asked and answers given during five NRC regional workshops held from October 25, 1983, to November 16, 1983, to discuss the scope and content of the LER rule with utility and NRC regional representatives. Within this document the following question (Question 25.8) was posed to the NRC:

25.8 Is the date of supplemental reports considered firm (i.e., a regulatory commitment) or is it just a target date?

Answer: The "Expected Submission Date" (Item 15) for supplemental reports is a target/planning date. It is not a regulatory commitment.

AP&L believes this previously provided NRC generic guidance clearly reflects that we are not in deviation of an NRC commitment.

However, as previously stated, AP&L does believe the backlog of overdue supplemental LERs is undesirable. As discussed with the Arkansas Nuclear One resident NRC inspectors prior to the issuance of this Notice of Deviation, AP&L had recognized this condition and has been taking appropriate corrective action.

This action includes:

- (1) assignment of an additional staff specialist within the Plant Licensing Section to provide increased staff support for the development and preparation of LERs and necessary supplemental reports;
- (2) utilization of the AP&L Commitment Tracking System (COMTRAC) and Licensing Information Request System (LIRs) to provide improved tracking of necessary supplemental reports and to ensure receipt of information required to complete a supplemental report by the Plant Licensing Section^{1/}; and
- (3) a temporary increase in the man-hours devoted to reduce this backlog through the use of increased staff overtime and the obtaining of contractor support personnel.

Based on these actions, submittal of supplemental reports for the LERs listed in Table 1 of this response should be complete by December 30, 1988.

Those LERs listed in Table 1 reflect overdue supplemental reports for LERs submitted following the significant change in reporting requirements as a result of the issuance of 10CFR50.73 (effective 1/1/84). LERs submitted prior to this reporting rule change, for which supplemental reports are overdue, will be reviewed to determine if supplemental reports would be appropriate in light of the new reporting requirements.

2. The corrective steps that have been taken and the results achieved.

See response to (1). above.

3. The corrective steps that have been taken to avoid further deviations.

As previously stated, AP&L does not concur a deviation has occurred, however, the actions taken as discussed in (1) above should prevent recurrence of the condition.

4. The date when full compliance will be achieved.

As previously stated, AP&L does not concur a deviation has occurred, therefore, AP&L is in full compliance at this time. However, as discussed in (1) above, submittal of the overdue LER supplemental reports (as listed in Table 1) should be complete by December 30, 1988.

^{1/}The COMTRAC and LIR systems were not previously utilized for tracking and obtaining information for LER supplemental reports as this was not considered an NRC commitment. Use of these systems will result in supplemental reports now being tracked in a manner similar to NRC commitments.

TABLE 1

ANO-1

<u>LER Number</u>	<u>Original Due Date</u>	<u>Subject</u>
1-85-001	8/1/85	Steam Driven EFW Pump Inoperable
1-85-012	1/10/87	Fire Suppression System Sprinkler Head
1-86-001	1/7/87	EDG Failure

ANO-2

2-84-015	8/31/84	Breach of Fire Barrier
2-84-018	11/15/84	Category "E" Valve Improperly Aligned
2-84-022	5/15/85	Loss of RCS Leak Detection System
2-85-002	8/30/85	RWT Level Transmitters Frozen
2-85-007	9/16/85	Fire Door Not Functional
2-86-003	8/1/86	Penetration Fire Damper Failures
2-86-012	1/30/87	Inoperable Code Safeties
2-86-014	1/30/87	EDG Fuel Oil Problems
2-87-003	10/1/87	Pressurizer Heater Failures
2-87-006	10/1/87	Pressurizer Heat Plug Seal Weld Leak