

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-313/85-24
50-368/85-25

Licenses: DPR-51
NPF-6

Dockets: 50-313
50-368

Licensee: Arkansas Power & Light Company (AP&L)
P. O. Box 551
Little Rock, Arkansas 72203

Facility Name: Arkansas Nuclear One (ANO), Units 1 and 2
AP&L General Offices, Little Rock, Arkansas

Inspection At: ANO Site, Russellville, Arkansas

Inspection Conducted: October 1-November 30, 1985

Inspectors: W.D. Johnson 12/5/85
W. D. Johnson, Senior Resident
Reactor Inspector
(pars. 4, 5, 6) Date

W.D. Johnson for 12/5/85
P. H. Harrell, Resident Reactor
Inspector
(pars. 2, 3, 7, 8, 9) Date

C.C. Harbuck 12-5-85
C. C. Harbuck, Resident Reactor
Inspector
(pars. 4, 5, 6, 10) Date

Approved: D.M. Hunnicutt 12/19/85
D. M. Hunnicutt, Acting Chief,
Project Section B, Reactor Project
Branch Date

Inspection Summary

Inspection Conducted October 1-November 30, 1985 (Report 50-313/85-24)

Areas Inspected: Routine, unannounced inspection including operational safety verification, maintenance, surveillance, followup on previously identified items, followup on licensee event reports, surveillance procedures and records, procurement program review, followup on IE Information Notices, and cold weather preparations.

The inspection involved 81 inspector-hours (including 11 backshift hours) onsite by three NRC inspectors, and 6 inspector-hours at the AP&L Little Rock General Offices (LRGO) by one NRC inspector.

Results: Within the nine areas inspected, no violations or deviations were identified.

Inspection Summary

Inspection Conducted October 1-November 30, 1985 (Report 50-368/85-25)

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The inspection involved 81 inspector-hours (including 10 backshift hours) onsite by three NRC inspectors, and 6 inspector-hours at the AP&L LRGO by one NRC inspector.

Results: Within the nine areas inspected, no violations or deviations were identified.

DETAILS1. Persons Contacted

- J. Levine, ANO General Manager
- *B. Baker, Operations Manager
- R. Blankenship, Nuclear Engineer
- M. Bolanis, Health Physics Superintendent
- D. Burton, Senior Engineering Technician
- B. Butzlaff, Quality Assurance Engineer
- *P. Campbell, Licensing Engineer
- T. Cogburn, Nuclear Services General Manager
- T. Coggins, Electrical Engineer
- *M. Cooper, Quality Assurance Engineer
- A. Cox, Operations Technical Support
- L. Dugger, Acting I&C Maintenance Superintendent
- **T. Enos, Licensing Manager
- E. Ewing, Engineering & Technical Support Manager
- B. Garrison, Operations Technical Support
- **H. Greene, Quality Engineering Supervisor
- L. Gulick, Unit 2 Operations Superintendent
- D. Hamblen, Quality Control Engineer
- H. Hollis, Security Coordinator
- D. Horton, Quality Assurance Manager
- D. Howard, Unit 1 Licensing Supervisorz
- D. Johnson, Licensing Engineer
- L. Humphrey, Administrative Manager
- J. Lamb, Safety and Fire Protection Coordinator
- *D. Lomax, Licensing Supervisor
- R. McCauley, Procedures Analyst
- J. McWilliams, Unit 1 Operations Superintendent
- J. Montgomery, Human Resources Supervisor
- M. Pendergrass, Acting Engineering & Technical Support Manager
- V. Pettus, Mechanical Maintenance Superintendent
- D. Provencher, Quality Engineering Supervisor
- P. Rogers, Plant Licensing Engineer
- *L. Sanders, Maintenance Manager
- *L. Schempp, Nuclear Quality Control Manager
- C. Shively, Plant Engineering Superintendent
- G. Storey, Safety and Fire Protection Coordinator
- B. Terwilliger, Operations Assessment Supervisor
- M. Todd, Civil Engineer
- R. Tucker, Electrical Maintenance Superintendent
- D. Wagner, Health Physics Supervisor
- R. Wewers, Work Control Center Manager
- S. Yancy, Mechanical Maintenance Supervisor

*Present at exit interview held on December 2, 1985, at ANO.

**Present at exit interview held on October 9, 1985, at LRG0.

The inspectors also contacted other plant personnel, including operators, technicians, and administrative personnel.

2. Followup on Previously Identified Items (Units 1 and 2)

(Closed) Unresolved Item 313/8316-03; 368/8316-04: Checking implementing procedures against basic commitments.

The licensee has changed the appropriate procedure to include requirements that the originator and reviewer check basic commitments against the requirements stated in the procedure. The procedural requirement has been implemented for initial issue and revision for all station procedures.

(Closed) Severity Level IV Violation 313/8429-01; 368/8429-01: Failure to maintain cable tray installations as required by design drawings.

The licensee has reviewed the applicability of IEEE 384-1975 and Regulatory Guide (RG) 1.75 to the installation of cable tray covers on Units 1 and 2. The results of the evaluation indicate that all safety-related cable trays meet the separation requirements stated in IEEE 384 and RG 1.75. The licensee concluded that cable tray covers are not required to be installed for separation considerations. The licensee also concluded that continued use of covers, although not safety significant, is a good practice and should be continued.

The licensee has revised Drawings E-59 and E-2059, "Conduit and Cable Tray Notes and Details," for Units 1 and 2, respectively, to reflect the results of the evaluation. In addition, the licensee plans to revise the Final Safety Analysis Report (FSAR) for both units to clarify the use of cable tray covers and to provide a detailed explanation of how the intent of IEEE 384 and RG 1.75 is met. The FSAR changes will be made at the next scheduled revision.

(Closed) Open Item 313/8501-05: Inclusion of labels into the design change process.

The licensee has revised the appropriate procedure to include requirements for installation of labels on switches, valves, breakers, and instruments. The fabrication and installation method for labels is performed in accordance with a newly issued AP&L specification. The installation is verified by installation verification requirements contained in each design package.

(Closed) Severity Level V Violation 313/8506-01; 368/8506-01: Failure

to obtain the quality assurance (QA) manager's approval signature prior to adding a vendor to the qualified vendors list (QVL).

The QA manager reviewed and approved the evaluations performed on the vendors when the problem was initially identified by the NRC inspector. No changes were made to the QVL after the QA manager's review was complete. The licensee has discussed this problem with the individuals involved in maintaining the QVL to stress the need for procedural compliance.

The NRC inspector reviewed the current issue of the QVL and all issued updates. No problems were noted where the proper reviews and approvals had not been obtained prior to addition of vendors to the QVL.

(Closed) Severity Level IV Violation 313/8506-02; 368/8506-02: Vendors listed on the QVL had expired NRC letters.

The licensee performed a review of all vendors on the QVL that had been qualified by a letter from the NRC stating that the vendor had an approved QA program. Based on this review, the licensee either requalified by another method or removed the vendors that had an expired NRC letter. The QVL was reissued with the corrections.

The licensee also revised the procedure that addressed the qualification of vendors. The procedure revision placed a time limitation on the use of the NRC-approved QA program letters.

The NRC inspector reviewed the latest issue of the QVL for vendors currently qualified by an NRC letter. The NRC inspector also reviewed the procedure changes made to specify use of this qualification method. No problems were noted.

(Closed) Deviation 313/8506-03; 368/8506-03: Failure to meet a commitment relating to distribution of controlled documents.

The licensee has reinforced the previously existing program for distribution of controlled documents. The licensee's actions included a review of all procedure distribution logs by the procedure analyst (PA) to verify receipt acknowledgment memoranda are returned in a timely manner, issuing a memo to all department heads to stress the importance of maintaining manuals current, and an informal configuration survey performed by the PA on a spot check basis to ensure manuals are current. The licensee has also established a program using a memo to all manual holders requesting them to perform a check on the revision status of the manual and to verify correctness by returning the memo with the verifier's signature.

The NRC inspector reviewed the document distribution logs and the status of procedure acknowledgment memoranda. The NRC inspector also performed a spot check of manuals to verify that they were up to date. No problems were noted.

(Closed) Deviation 313/8506-04; 368/8506-04: Failure to delete use of conversation memoranda (CM).

The licensee stated that the root cause of this deviation was the failure of licensing personnel to verify the information supplied by engineering regarding revision of the affected procedure. To ensure compliance with future commitments made to the NRC, the licensee reviewed this incident with licensing personnel to stress the importance of verifying the accuracy of information provided by other groups. The licensee stated that the current procedure covering NRC correspondence control is adequate and does not require revision.

The NRC inspector reviewed the current use of CMs by engineering. This review was performed to verify that CMs are currently being used as described in procedures and that the problem originally identified in NRC Inspection Report 50-313/83-17; 50-368/83-17 had been corrected. The NRC inspector reviewed design change packages generated by the LRGO engineers. No cases were noted where CMs were not used in accordance with procedure requirements.

(Open) Open Item 313/8506-05; 368/8506-05: Establishment of a program for initial, documented evaluation of the effect of potential deficiencies on continued safe plant operation.

The licensee has not established a formal method for initial evaluation and documentation of potential nuclear safety concerns (PNSC). However, the licensee stated that an initial review is performed by the appropriate individuals but no documentation is maintained to record the results of these reviews.

Since this item was last reviewed, the licensee has established a program where the status of all open PNSCs are presented to the safety review committee (SRC) each calendar quarter. These presentations are not provided for the SRC to make a determination of continued safe plant operation, but are a means of establishing what progress has been made to reach a final resolution of an identified concern. The SRC review was established to ensure that resolution is reached within a reasonable period of time.

The licensee is still in the process of establishing a formal program for initial, documented evaluations of identified

concerns. The licensee stated the program should be in place in the near future.

- (Closed) Unresolved Item 313/8506-06; 368/8506-06: Seismic qualification of the Unit 1 reactor trip breaker (RTB) cabinets.

The licensee has completed seismic calculations on the RTB cabinets. The results of the calculations indicate that the cabinets are seismically qualified for the Unit 1 design basis earthquake.

The NRC inspector reviewed the calculations and noted no problems.

- (Closed) Open Item 313/8521-01; 368/8522-01: Establishment of a labeling program.

See discussion for Open Item 313/8501-05 in this report section.

- (Closed) Severity Level V Violation 368/8522-02: Obsolete procedure posted on the remote shutdown panel.

The licensee removed the obsolete document from the shutdown panel and replaced it with a currently effective copy.

The licensee has made changes to the appropriate procedures to ensure the documents posted throughout Units 1 and 2 are maintained current. The documents posted in the plant have been added to the master procedure distribution list. In this manner, the plant document locations will receive the same type distribution as do controlled-copy manual holders.

3. Licensee Event Report (LER) Followup (Units 1 and 2)

Through direct observation, discussions with licensee personnel, and review of records, the following event reports were reviewed to determine that reportability requirements were fulfilled, immediate corrective action was accomplished, and corrective action to prevent recurrence has been accomplished in accordance with Technical Specifications.

Unit 1

- | | |
|-----------|--|
| 85-006-00 | Failure to perform high-range containment radiation monitor surveillance |
| 85-007-00 | Reactor trip caused by main feedwater pump problem |
| 85-008-00 | Reactor trip caused by main feedwater pump problem |
| 85-010-00 | Reactor trip caused by main feedwater pump problem |

Unit 2

- 85-003-00 Failure to perform containment airlock surveillance
- 85-013-00 Failure to perform the incore detector system weekly check
- 85-014-00 Reactor trip caused during plant protective system surveillance
- 85-015-00 Reactor trip caused by erroneous control element assembly position signal
- 85-016-00 Reactor trip caused by erroneous indications due to lightning
- 85-017-00 Reactor trip caused by a turbine trip due to loss of vacuum
- 85-018-00 Reactor trip caused by a component failure in the control element assembly calculators

Unit 1 LER 85-006-00 reported the failure to perform surveillance testing of the high-range containment radiation monitors. The licensee has implemented a procedure and performed the surveillance. The licensee has enhanced administrative controls over tracking Technical Specification amendments to ensure this problem does not recur by review of all Technical Specification correspondence by plant licensing personnel.

Unit 1 LERs 85-007-00, 85-008-00, and 85-010-00 reported reactor trips due to problems with a main feedwater (MFW) pump. In each case, the MFW pump control system developed mechanical problems which caused a loss of MFW and a resultant reactor trip. The licensee's engineering staff is currently reviewing the problems associated with the MFW pumps to determine appropriate changes to increase the reliability of the MFW system. The engineering review should be completed in the near future and is intended to reduce or eliminate reactor trips due to MFW problems.

Unit 2 LERs 85-003-00 and 85-013-00 reported a failure to perform surveillances in accordance with Technical Specification requirements. The licensee has taken corrective action by issuing procedure changes. The NRC inspector verified that the surveillances have been performed as required since the discrepancies were reported by the licensee.

Unit 2 LER 85-014-00, 85-015-00, 85-016-00, 85-017-00, and 85-018-00 reported reactor trips due to various reasons. In all but one case, the

licensee determined the root cause and took appropriate corrective action to prevent recurrence. In the case of the reactor trip due to lightning, no definite root cause could be determined. The licensee's investigation did not reveal any failed or damaged components, so the licensee attributed the reactor trip to electrical transients induced by a lightning strike. The corrective actions taken included revisions to test and operating procedures, repair and/or replacement of components, and training of technicians and operators, as appropriate.

4. Operational Safety Verification (Units 1 and 2)

The NRC inspectors observed control room operations, reviewed applicable logs, and conducted discussions with control room operators. The inspectors verified the operability of selected emergency systems, reviewed tagout records, verified proper return to service of affected components, and ensured that maintenance requests had been initiated for equipment in need of maintenance. The inspectors made spot checks to verify that the physical security plan was being implemented in accordance with the station security plan. The inspectors verified implementation of radiation protection controls during observation of plant activities.

The NRC inspectors toured accessible areas of the units to observe plant equipment conditions, including potential fire hazards, fluid leaks, and excessive vibration. The inspectors also observed plant housekeeping and cleanliness conditions during the tour. Several fire doors in the Unit 2 auxiliary building tended to be held open by ventilation air flow and had to be manually closed. The NRC inspectors observed a degradation in the cleanliness of the piping penetration rooms and the intake structures. While no fire hazards or severe operational limitations were observed to be caused by the lack of cleanliness in these areas, the NRC inspectors expressed a concern to the licensee that a lack of cleanliness in these areas reflects poorly on the licensee's commitment to excellence in plant operation.

The NRC inspectors walked down the accessible portions of the Unit 1 decay heat removal system. The walkdown was performed using Procedure 1104.04 and Drawings M-230, M-231, M-232, and M-233. During the walkdown, the NRC inspectors noted the following items:

- . The area inside and around the enclosure for LT-1411, a level transmitter for the borated water storage tank (BWST), was in need of housekeeping attention. Also, some of the tubing insulation inside this enclosure was missing. A job request was prepared to initiate action to clean up the area and replace the missing insulation.
- . Insulation around PSV-1412, the BWST relief valve and vacuum breaker was missing. A job request was prepared to have the insulation replaced.

- . Two instrument line vent valves, DH-1020C and DH-1013C, were listed in the system lineup procedure, but were not shown on Drawing M-232. These valves are expected to be added to the drawing during a future revision.

These reviews and observations were conducted to verify that facility operations were in conformance with the requirements established under Technical Specifications, 10 CFR, and administrative procedures.

No violations or deviations were identified.

5. Monthly Surveillance Observation (Units 1 and 2)

The NRC inspector observed Technical Specification required surveillance "Power Range Linear Amplifier Calibration At Power" (J.O. 704232, Procedure 1304.32) for Unit 1, and verified that testing was performed in accordance with adequate procedures, test instrumentation was calibrated, limiting conditions for operation were met, removal and restoration of the affected components were accomplished, test results conformed with Technical Specifications and procedure requirements, test results were reviewed by personnel other than the individual directing the test, and any deficiencies identified during the testing were properly reviewed and resolved by appropriate management personnel.

The inspector also witnessed portions of the following test activities:

- . Unit 2 - "Emergency Diesel Generator Monthly Test"
(Procedure 2104.36, Supplement 2)
- . Unit 2 - "Margin to Saturation Instrument Surveillance Test"
(Procedure 2304.78)
- . Unit 1 - "Reactor Protection System, Channel B Test"
(Procedure 1304.28)
- . Unit 2 - "Plant Protection System, Channel B Test"
(Procedure 2304.38)
- . Unit 2 - "Process Radiation Monitoring System Calibration"
(Procedure 2304.27)

The NRC inspector reviewed Procedure 2304.27, discussed it with the technicians performing it, and determined that the procedure was not being followed as written. The problem was that the acceptance criteria for the surveillance were considered incorrect by the licensee. So, instrument adjustments possibly required to meet acceptance criteria were not being done. Subsequent to this, the licensee suspended the continued performance of the radiation monitoring system calibration until the

procedure had been revised to reflect exactly what the licensee was doing. However, the NRC inspector determined that the licensee apparently had yet to decide what the acceptance criteria should be. Until the operability of the process radiation monitoring system is established by the successful completion of a technically correct and approved calibration surveillance procedure, this problem will remain as an unresolved item (368/8525-01).

No violations or deviations were identified.

6. Monthly Maintenance Observation (Units 1 and 2)

Station maintenance activities of safety-related systems and components listed below were observed to ascertain that they were conducted in accordance with approved procedures, Regulatory Guides, and industry codes or standards; and in conformance with Technical Specifications.

The following items were considered during this review: the limiting conditions for operation were met while components or systems were removed from service; approvals were obtained prior to initiating the work; activities were accomplished using approved procedures and were inspected as applicable; functional testing and/or calibrations were performed prior to returning components or systems to service; quality control records were maintained; activities were accomplished by qualified personnel; parts and materials used were properly certified; radiological controls were implemented; and fire prevention controls were implemented.

Work requests were reviewed to determine status of outstanding jobs and to ensure that priority is assigned to safety-related equipment maintenance which may affect system performance.

The following maintenance activities were observed:

- . Installation of rotating assembly on 'B' HPSI, Unit 2 (J.O. 701354)
- . Operational test run of 'B' HPSI pump, Unit 2 (Procedure 2401.39, Supplement 2)
- . Addition of lube oil to Unit 2 diesel generator (J.O. 702891)
- . Adjusting position indication for 2CV-5035-1 (J.O. 703510)
- . Overcurrent trip tests on reactor trip system breaker (Procedure 2405.17)

No violations or deviations were identified.

7. Surveillance Procedures and Records (Units 1 and 2)

The NRC inspector reviewed surveillance procedures and records to verify the following:

- . Tests are in conformance with Technical Specifications, inservice inspection (ISI) program, and procedural requirements, as appropriate.
- . Completed tests have been reviewed as required by plant administrative requirements.
- . Tests were performed within the time frequencies specified by the Technical Specifications or ISI program.
- . Appropriate action was taken for any item failing the acceptance criteria.

The NRC inspector verified that procedures implementing Technical Specification or ISI requirements included the following:

- . Prerequisites and preparations for the specified test.
- . Acceptance criteria for the test.
- . Instructions to ensure systems or components are restored to operation following testing.
- . A statement identifying the procedure as a test required by the Technical Specifications and noting that immediate notification to the shift supervisor is required if the system or component fails the test.

The following surveillance requirements were reviewed by the NRC inspector. During this review, the NRC inspector also reviewed the implementing surveillance test procedure to verify the technical content of the procedure met the Technical Specification or ISI requirement and that the procedure was clearly written and usable by the craftsperson. The procedure reviewed is listed in parenthesis after each surveillance.

Unit 1

- . Control rod trip insertion time (Procedure 1304.35)
- . Reactor building tendon surveillance (Procedure 1402.90)
- . Visual inspection of the reactor building structure (Procedure 1306.22)

- . Establishment of a periodic core power distribution map (Procedure 1302.12)
- . Testing of the reactor trip upon turbine trip circuitry (Procedure 1105.01)
- . Calibration of the electromatic relief valve flow monitor (Procedure 1304.85)
- . Verification of operation of the low pressure injection pump (Procedure 1104.04, Supplement 1)
- . Fire suppression system functional test (Procedure 1104.32, Supplement 1)
- . Inspection of the emergency diesel generator fuel oil vault fire system spray headers (Procedure 1104.32, Supplement VII)
- . Inspection of reactor internals vent valves (Procedure 1306.08)
- . Testing of pressurizer code safety valves (Procedure 1802.03)
- . Cycling of motor-operated valves in the emergency feedwater system (Procedure 1106.06, Supplement 3)
- . Performance of station battery discharge test (Procedure 1307.14)
- . Inservice testing (IST) of the steam-driven emergency feedwater pump (Procedure 1106.06, Supplement III)
- . IST of CV-1228 (Procedure 1104.02, Supplement 1)

Unit 2

- . Movement of control element assemblies (Procedure 2105.09, Appendix A)
- . Core operating limits supervisory system margin alarm operability test (Procedure 2312.01)
- . Channel function test of chlorine detection system (Procedure 2104.34, Supplement 3)
- . Channel calibration of triaxial response-spectrum recorders (Procedure 2304.58)
- . Check on pressurizer proportional heaters power consumption (Procedure 2307.09)

- . Verification of flow through the reactor vessel head and reactor coolant system high point vents (Procedure 2305.06, Supplement 3)
- . Testing of the throttling valves for the high and low pressure safety injection systems (Procedures 2104.40, Supplement 4)
- . Testing of the safety injection tank isolation valves (Procedures 2305.03 and 2104.07, Supplement 3)
- . Verification of the position of the containment purge supply and exhaust valves (Procedure 2305.05, Supplement 3)
- . Testing of the personnel and emergency escape hatches air locks (Procedure 2304.22)
- . Transfer of fuel oil from storage tank in one train to emergency diesel generator in the other train (Procedure 2104.36, Supplement 5)
- . Performance of station battery discharge test (Procedures 2403.01 and 2403.02)
- . Check on diesel-driven fire pump battery bank (Procedure 1104.32, Supplement 2)
- . Air flow test of fire system headers in the cable spreading room and the emergency diesel generator fuel vaults (Procedure 1104.32, Supplements 15, 16, and 17)
- . IST on the sodium hydroxide addition pump (Procedure 2104.05, Supplement 5)
- . IST of 2CV-4921-1 (Procedure 2104.03, Supplement 3)

During this review, the NRC inspector did not identify any cases where the licensee did not meet the requirements stated in the Technical Specifications or IST program. Based on the documentation reviewed, it appears that the licensee is implementing a surveillance and IST program that fully meets the applicable requirements.

No violations or deviations were identified. This inspection effort will be continued during a future inspection.

8. Procurement Program (Units 1 and 2)

The NRC inspector performed a review to verify that qualification of suppliers was accomplished in accordance with 10 CFR, codes and standards, the Quality Assurance Manual-Operations, and quality assurance (QA) administrative procedures.

The procurement program review included the following elements:

- . An acceptable method has been established for qualifying a vendor, supplier, or contractor providing goods or services.
- . Provision for purchaser's right of access to supplier's facilities and documents.
- . Maintenance of an approved bidder's list, including a method for updating the list.
- . Maintenance of records of supplier qualifications and audits.
- . Administrative responsibilities have been procedurally established for the items listed above.

The NRC inspector reviewed the QA documentation for vendor qualification at the Little Rock General Offices. Based on the records reviewed, it appears that the vendors listed on the qualified vendors list have been qualified in accordance with the appropriate requirements.

No violations or deviations were identified. This inspection effort will be continued during a future inspection.

9. Followup on IE Information Notices (Units 1 and 2)

The NRC inspector reviewed the licensee actions with respect to IE Information Notices (IEN) issued during the first part of 1985. The IENs reviewed included 85-01 through 85-50 and the supplements. The review included verification that these notices had been received by the licensee, were distributed to appropriate personnel for an applicability review, and that appropriate corrective actions had been taken or were scheduled to be taken.

The licensee has received IENs 85-01 through 85-50; however, the review for all the notices has not been completed. For those notices that have been reviewed, it appears that the corrective actions were appropriate. The NRC inspector also reviewed a sampling of the implementation of the corrective actions to verify the action taken was in accordance with the results of the documented review. No problems were noted.

The licensee has yet to complete a review of IENs 85-02, 85-10, 85-21, 85-23, 85-24, 85-27, 85-28, 85-32, 85-37, 85-39, 85-45, and 85-47. The NRC inspector noted that a majority of the unreviewed IENs had been assigned to the plant engineering group for action. The plant engineering group has not provided a review in a timely manner. The licensee stated that the reviews are scheduled to be completed by the end of November 1985.

No violations or deviations were identified.

10. Cold Weather Preparations

The purpose of this area of the inspection was to determine whether the licensee has maintained effective implementation of the program of protective measures for extreme cold weather committed to in response to IE Bulletin 79-24. Also reviewed were the actions taken by the licensee to address the problems identified in LER 85-002-00, "Refueling Water Tank Level Transmitters Inoperable Due to Freezing."

The NRC inspector reviewed the latest revision of licensee Procedure 1307.37, "Plant Freeze Protection Testing," Revision 3, approved March 1, 1985. The NRC inspector found that this procedure had been performed recently. All equipment problems noted during the test were found to have been addressed by the licensee's corrective maintenance program. The NRC inspector concluded that the procedure had apparently been performed as written. However, the following problems with the procedure were identified:

- . The procedure did not properly address the new freeze protection equipment for the refueling water tank (RWT) level transmitters, installed by Design Change Package (DCP) 85-2127, discussed below. A procedure revision is planned by the licensee.
- . The procedure does not specifically require inspection of insulation. As noted in paragraph 4 of this report, during a walkdown of the Unit 1 DHR system, the insulation on some heat traced components of the borated water storage tank was found missing. However, the heat tracing, as verified by performance of the procedure was working properly. The licensee plans to issue a separate procedure to inspect such insulation.

The NRC inspector reviewed the licensee's actions in response to LER 85-002-00. DCP 85-2127 was initiated to upgrade the freeze protection for the RWT level transmitters to prevent recurrence of the inoperability problems identified in the LER. The NRC inspector reviewed this DCP, held discussions with the design engineer, and inspected the additional hardware installed by the DCP. The NRC inspector concluded that the measures taken by this DCP appeared to be adequate to prevent the level transmitters and sensing lines from freezing. However, LER 85-002-00 will remain open until issuance of the licensee's update.

Further inspection in this area will be performed to verify continued effectiveness of the licensee's freeze protection program, and in particular the freeze protection for the RWT level transmitters.

11. Unresolved Item

Unresolved items are matters about which more information is required in order to ascertain whether or not the items are acceptable, violations, or deviations. The following unresolved item was discussed in this report:

<u>Paragraph</u>	<u>Item</u>	<u>Subject</u>
5	368/8525-01	Process radiation monitor calibration

12. Exit Interview

The NRC inspectors met with Mr. B. A. Baker (ANO Manager of Operations) and other members of the AP&L staff at the end of this inspection. At this meeting, the inspectors summarized the scope of the inspection and the findings.