



ARKANSAS POWER & LIGHT COMPANY
May 13, 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, TX 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
50-313/88-06 and 50-358/88-06

Dear Mr. Callan:

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

Very truly yours,

J.M. Levine by [Signature]
J. M. Levine
Executive Director
Nuclear Operations

JML:PLM:dm
enclosure

cc w/encl: U. S. Nuclear Regulatory Commission
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Notice of Violation

- A. Technical Specification 6.8.1 requires that written procedures be established and implemented covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Administrative procedures are included in this appendix.

Procedure 1000.24, Control of Maintenance, has been established in accordance with this Technical Specification.

Section 6.1.5 of this procedure requires that maintenance on plant equipment be accomplished in accordance with an approved job order.

Section 6.2.12 of this procedure specifies that work shall be limited to the work scope described in the job order/work package.

Contrary to the above, on February 26, 1988, the replacement of Relay 63X/4926 and Relay 94-0340-2 was initiated without an approved job order. The job order in use authorized the replacement of specified red channel Potter Brumfield Model MDR relays. Relays 63X/4926 and 94-0340-2 are components in the green channel.

This is a Severity Level IV violation. (Supplement I)(368/8806-01)

Response to Violation 368/8806-01

- (1) The reason for the violation if admitted:

AP&L acknowledges that the violation occurred as stated above.

The reason for the violation was inattention of the maintenance electricians performing the activity to the limited work scope authorized by the controlling job order. As detailed in the job order, Workplan 2409.05, Changeout of Potter and Brumfield Model MDR D.C. Relays, was to be used to accomplish the relay replacement. The work plan included both red and green channels of redundant relays. However, the job order in use at the time only authorized changeout of the red channel relays.

Previous replacement of these relays had occurred in prior outages in 1983, 1985 and 1986. During these outages only a single job order was issued for changeout of both red and green channel relays using the workplan. The workplan required approval by Control Room Operations personnel for each relay replacement. This prevented two relays in opposite channels being worked concurrently. During the outage in 1988, separate red and green channel relay

changeout job orders were issued as an additional assurance two relays in opposite channels would not be worked concurrently.

Although the maintenance electricians who performed the relay replacement were not cautioned as to the change from prior practice of issuing a single job order, their work performance should not have exceeded the authorized work scope of the controlled job order.

Because the workplan continued to require Control Room Operations personnel approval for each relay replacement, to assure relays in opposite channels were not worked concurrently, the replacement of the two green channel relays not within the scope of the red channel relay job order did not present a safety concern as the Operations Shift Supervisor had approved the relay replacement.

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

The occurrence was discussed with the electrical maintenance supervisor in charge of the job. Written reprimands were issued to the two lead electricians performing the relay replacement. The purpose of the two job orders was explained such that the remaining replacements were accomplished according to the job order instructions and scope.

Training records indicate that electricians had reviewed 1000.24, Control of Maintenance, within the past year. Therefore, it was not deemed necessary to conduct any additional training at this time.

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

Because the electricians were sensitive to ensuring channel separation and performing the work to an approved workplan in a manner previously employed, it was concluded that this was a unique situation not indicative of any general shortcomings in the Maintenance Department. Therefore, no further action is planned.

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

Full compliance was achieved February 27, 1988.

Notice of Violation

- B. Technical Specification 6.8.1 requires that written procedures be established and implemented covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Administrative procedures are included in this appendix.

Procedure 1000.18, "Housekeeping," has been established in accordance with this Technical Specification.

Section 4.2.1 of this procedure defines Level I housekeeping areas as, "Areas where the highest order of cleanliness and the most stringent controls are required. This level of housekeeping is applicable to areas immediately adjacent to open primary systems or components."

Section 6.2.4 of this procedure requires that Level I housekeeping areas be kept clean with abrasive dirt or grit minimized and that tools be secured by lanyards.

Contrary to the above, on February 29, 1988, the NRC inspectors observed housekeeping discrepancies on the fuel handling bridge during fuel handling activities over the reactor vessel. These discrepancies included loose tools, loose debris, and excessive dirt on the floor of the fuel handling bridge.

This is a Severity Level IV violation. (Supplement I)(368/8806-02)

Response to Violation 368/8806-02

- (1) The reason for the violation if admitted:

AP&L acknowledges the violation occurred as stated above.

The reason for the violation was due to an inappropriate relaxation of cleanliness controls by the Senior Reactor Operator in charge of activities on the fuel handling bridge.

As required by procedures, the bridge had been previously inspected to ensure that loose items were removed or secured prior to initial fuel removal. Subsequent to that inspection, maintenance on the refueling machine hoist brake was required. During this on-going maintenance, tools being used and resulting debris were not controlled as required by housekeeping and refueling procedures.

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

The tools were properly secured and cleaning of the bridge was performed. The Senior Reactor Operators in charge of the refueling were instructed to comply with procedures to ensure that housekeeping received required attention during refueling operations. The incident was also discussed with the operating crews. No further incidents occurred during the remainder of the refueling activities.

An inservice inspection of the reactor vessel was conducted during the period of time the fuel was out of the core. A core barrel and reactor vessel inspection and cleanup was performed following the completion of these activities and prior to reloading fuel. Although there were no indications that any loose objects fell from the bridge during the time the hoist brake maintenance was being performed, this inspection would have located such debris which would have been removed during the subsequent cleanup.

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

This violation is similar to a previously issued violation, 313/8429-05. A corrective action taken as a result of that violation included procedure revisions providing more detailed housekeeping inspections prior to and during fuel handling operations. As a result, the present procedure requirements are considered adequate. An additional corrective action to be taken included emphasizing the necessity of cleanliness controls during fuel handling to refueling personnel prior to future fuel handling operations. These requirements were re-enforced during training conducted for the next refueling outages for both units. However, due to errors in the actions assigned for accomplishing the training, no further emphasis during subsequent pre-outage training occurred, i.e., prior to the present outage, 2R6.

Emphasis on cleanliness controls during fuel handling operations will be included in future pre-outage training as originally intended.

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

Full compliance was achieved February 29, 1988, within one hour of the time the NRC inspector identified the concern to AP&L.