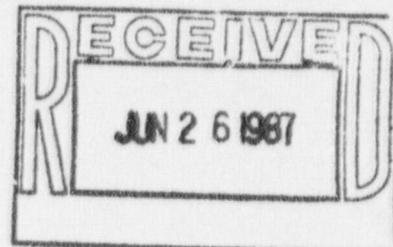




ARKANSAS POWER & LIGHT COMPANY

June 22, 1987



ØCANØ68704

J. E. Gagliardo, Branch Chief
Reactor Projects Branch
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 Reports
50-313/87-13 and 50-368/87-13

Dear Mr. Gagliardo:

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

Sincerely,

J. M. Levine / SMD

J. M. Levine
Executive Director
Nuclear Operations

JML:PLM:djm
enclosure

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Notice of Violation

- A. Criterion V of Appendix B to 10CFR Part 50 and Section 5 of the Arkansas Power and Light Quality Assurance Manual - Operations, require, in part, that activities affecting quality shall be prescribed by documented drawings and shall be accomplished in accordance with these drawings.

Design Drawing H25-911 depicts the design configuration of Seismic Support 2HCB-9-H11. This Seismic Category I support was provided to support the operator of Control Valve 2CV-4921-1, a boric acid storage tank gravity feed valve, during a seismic event.

Contrary to the above, on April 9, 1987, the NRC inspector found that Seismic Support 2HCB-9-H11 was missing.

This is a Severity Level IV violation. (Supplement I)(368/8713-01)

Response to Violation 368/8713-01

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

AP&L agrees that the configuration of the seismic support for valve operator 2CV-4921-1 was not in accordance with design drawings. Job orders associated with work performed on this valve or its operator were reviewed. In 1980, a job order was issued to verify that seismic brackets were installed on a number of valves including 2CV-4921-1. Later job orders utilized a procedure which included a step for reinstallation of seismic supports. However, no determination could be made as to when the support was removed and not reinstalled. An inspection of the torque switch wiring was performed in July, 1985. The job order for this inspection did not address removal or reinstallation of seismic supports. It is possible it was removed at this time and not replaced properly.

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

After being notified of the NRC inspector's finding April 9, 1987, Engineering inspected the valve operator and compared it to the design drawing for the seismic support. This indicated it was not in the designed configuration. Following this inspection, the flowpath for boration which includes 2CV-4921-1 was declared inoperable. A job request was initiated for repairs.

The missing seismic support was fabricated and installed as depicted on the design drawing. This work was completed April 10, 1987. An engineering evaluation of the operability of the valve without the seismic support was initiated.

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

It appears from the review of job orders that the removal and subsequent failure to reinstall the seismic support occurred prior to procedure revisions which address restoration of equipment. Current procedures for motor-operated valves have a step that requires reinstallation of any seismic restraints that were removed to perform work and include a typical drawing of motor-operated valve seismic supports for inspection and/or replacement.

To address the fact that the support was missing, we are initiating system walkdowns to identify this type of discrepancy. The details of this program were provided in response to violation 368/8708-01 in our letter of June 15, 1987 (ØCANØ687Ø3).

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

Repairs were complete and full compliance was achieved April 10, 1987.

Notice of Violation

- B. Unit 1 Technical Specification 6.8.1 requires, in part, that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972. Section A of this Appendix includes administrative procedures for bypass of safety functions and jumper control.

Administrative Procedure 1000.28, Jumper and Lifted Lead Control, has been established in accordance with this Technical Specification.

Section 6.1.6 of Revision 6 of this procedure required that an engineering review of temporary modifications be conducted to determine compliance with applicable codes, standards, and design requirements. Section 6.1.2 of this procedure required that temporary modifications shall not be made until the required engineering review has been performed and it has been determined that the temporary modification will not create an unreviewed safety question.

Contrary to the above, on April 16, 1987, the NRC inspector found that a temporary modification had been made to the seismic condensate storage tank without performance of the required reviews and evaluations. The temporary modification consisted of a fire hose and associated fittings connected to a spare penetration into the tank isolated by Valve CS-284.

This is a Severity Level IV Violation. (Supplement I)(313/8713-01)

Response to Violation 313/8713-01

- (1) The reason for the violation if admitted: AP&L agrees that the connection of the fire hose to a spare penetration on the seismic condensate storage tank temporarily modified the penetration without the proper review required by procedure 1000.28, Jumper and Lifted Lead Control. The seismic condensate storage tank was constructed as the primary source of emergency feedwater. The normal means for filling and makeup to the tank will be through the condensate vacuum degasifier once operational. In the system turnover, no means for filling the tank was provided as construction continued on the vacuum degasifier system. It was not anticipated that tank makeup would be required before the normal means would be available; however, once the emergency feedwater pumps were aligned to the tank, unidentified leakage resulted in a slow decrease of the tank level. This was later identified as a continuous demand of approximately 5 to 6 gallons per minute condensate flow as coolant from the emergency feedwater pump suction to the EFW pump bearing coolers.

As a result of the decreasing tank level approaching the technical specification limit, attempts were made to identify an interim means of providing makeup to the tank. On December 31, 1986, Operations contacted the construction/startup engineer to determine how the initial filling was accomplished. The CS-284 penetration had been utilized. The reconnections to this penetration were made and refilling the tank commenced. This was not performed under a job order with a temporary modification nor were temporary procedure changes made to control the configuration. This was in violation of the ANO procedures.

The system turnover was incomplete in that the normal means of makeup remained under the control of Plant Modifications. The system turnover was informally provided as installation job orders were closed. This may have contributed to the misunderstanding of the temporary modification requirements in that activities conducted within the scope of construction do not require temporary modification controls. However, because the tank had been put into service, it should have been recognized that this constituted a temporary modification requiring a safety evaluation. While temporary hose connections are not always treated as temporary modifications, such as draining a system to a floor drain with a hose, this particular connection could have resulted in inadvertent drain-down of the tank level had the hose ruptured. Low tank level alarms with annunciation in the control room and log readings taken once per shift on tank level would have alerted operators had a hose rupture occurred. In addition, even at the maximum expected flow rate that would have existed if the hose had ruptured, sufficient time would have been available to detect the leak and shift to a secondary source of condensate or to service water for emergency feedwater suction.

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

After the NRC inspector identified the concern and after an evaluation determined that the penetration had no standpipe inside the tank which would prevent draining of the tank, the hose was disconnected and the penetration was returned to its normal condition. A temporary procedure change was made to the "Emergency Feedwater Pump Operation" procedure which delineates a method for filling the tank utilizing a connection with a 29' internal standpipe. An alternate method through a condensate vacuum degasifier connection is being pursued.

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

A complete rewrite of the procedure which controls temporary modifications was effective January 1, 1987. This revision provides more specific guidance than the previous revisions regarding safety evaluations. However, the specific guidance on what constitutes a temporary modification will be reviewed further to determine if installations such as the one addressed

here are adequately discussed. Additional training will be provided on this guidance. These actions should be complete by October 31, 1987. Additionally, a proceduralized system modification turnover is being implemented. Any outstanding system deficiency will be identified for required actions. This process is currently scheduled to be in effect by the end of September, 1987.

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

The removal of the temporary connection flange on CS-284 was complete April 17, 1987, achieving full compliance.