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U. S. Nuclear Regulatory Commission
Document Control Desk
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SUBJECT: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313/50-368
License Nos. DPR-51 and NPF-6
Reply to Notice of Violation and Answer to
Proposed Civil Penalty Related to Equipment
Qualification

Gentlemen:

As a followup to recent conversations between members of our staffs, we are providing additional information relative to our June 22, 1989, letter (ØCANØ689Ø6) concerning EQ enforcement issues. Specifically, the letter had characterized the number of deficiencies in two areas as "approximate"; subsequently, we were asked to clarify the specific numbers involved since they did not appear consistent with numbers provided NRC during the August 1988, enforcement conference on the subject.

We are appreciative of the opportunity to rectify the discrepancies.

The requested information is provided in the attachment. We trust this additional information is sufficient to allow your staff to reach closure of these issues. If we can provide any additional information or clarification, we would be pleased for the opportunity to do so.

Very truly yours,

T. G. Campbell

TGC:djm
attachment

cc: U. S. Nuclear Regulatory Commission
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Tape Splices

Regarding the issue of unidentified electrical tape splices within Limitorque actuators, we are not able to precisely determine the number of affected devices. In preparation for the enforcement conference it was paramount that the figures provided not be underestimated if precise values could not be determined; consequently, the figure of 40 tape splices was considered bounding. Our recent re-review of the work packages associated with our Limitorque upgrade program revealed that 1 actuator is definitively noted to have an unidentified electrical tape splice, 12 others are considered strongly indicative of such splices, and an additional 11 devices are considered possible (though not necessarily probable) cases. Therefore, our judgement is that between 13 and 24 actuators were affected with our best estimate remaining "approximately 20" as previously indicated in our June 22 letter.

Regarding the device specific safety implications of the tape splices, the following breakdown is provided:

24 devices potentially affected
9 - inside containment
15 - outside containment

Of the 9 inside containment devices, 4 are required for containment isolation and do not require qualification beyond the initial valve stroke in response to the automatic initiation signal, 4 are maintained in their closed position during normal operation and do not require qualification (beyond position indication), and the remaining device (the PORV block valve) is not strictly required to be qualified. It was voluntarily placed on the EQ list by AP&L.

T-Drains

The second item involved the number of actuators which required installation of T-drains. As stated before, it was our position that such devices were not required (as documented by the AP&L EQ files well before the qualification deadline). We recognize that our staffs have reached differing technical conclusions on the matter; moreover, we considered the matter moot based on AP&L's decision to install the drains as part of a general actuator refurbishment program. Because the NRC is apparently still considering the item within enforcement context, we are providing the following additional details concerning T-drain installation.

As indicated in the enforcement conference and confirmed by our recent re-review of the work packages, T-drains were installed in 27 actuators; however,

1. Five (5) of these actuators were qualified without T-drains installed (NRC has previously acknowledged for such devices no T-drains are required).

2. T-drains were installed on 2 devices that actually do not require environmental qualification; therefore, lack of T-drains is not a concern.
3. Eighteen (18) of the remaining devices perform their safety functions immediately following the onset of harsh conditions consequently, the T-drain function (drainage of moisture collected within the motor) is clearly not required in these cases. These devices are not required to change position in the course of a postulated LOCA.

Therefore, only 2 devices remain as potentially requiring the T-drain for long-term drainage provisions. These results are not surprising considering the general design approaches which typically placed modulating type valves outside containment.

In summary, the electrical tape issue affected from 13 to 24 actuators and T-drain concerns are basically limited to 2 actuators. These components reflect the following specific system applications.*

- Chemical Addition
- Decay Heat Removal
- Containment Building HVAC
- Makeup and Purification
- Service Water
- Sampling

Therefore, basically 6 different systems are affected. These numbers are considered adequate to conservatively bound the issues relative to application of any enforcement criteria.

* One device is affected on the reactor coolant system; however, it is not strictly required to be environmentally qualified. Its function is not credited in response to any design basis accident and its failure is bounded by currently approved safety analyses.