

MAY 10 1989

In Reply Refer To:
Pockets: 50-313/88-36
50-368/88-36

Arkansas Power & Light Company
ATTN: Mr. Gene Campbell
Vice President, Nuclear
Operations
P.O. Box 551
Little Rock, Arkansas 72203

Gentlemen:

Thank you for your letter of March 10, 1989, in response to our letter and Notice of Violation dated February 10, 1989. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

Original Signed By
L. J. Callan

L. J. Callan, Director
Division of Reactor Projects

cc:
Arkansas Nuclear One
ATTN: J. M. Levine, Executive
Director, Nuclear Operations
P.O. Box 608
Russellville, Arkansas 72801

Arkansas Radiation Control Program Director

bcc w/ attachment: (see next page)

*RIV:OPS	*C:OPS	D:DRS	D:DRSS	D:DRP 5/10/89
DLKelley/lb	JEGagliardo	JLMilhoan	ABBeach	LJCallan
/ /89	/ /89	5/8/89	5/8/89	5/10/89

*Previously concurred

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PDR ALOCK 05000313
Q PDC

LEO
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bcc w/attachment:
bcc to DMB (IE01)

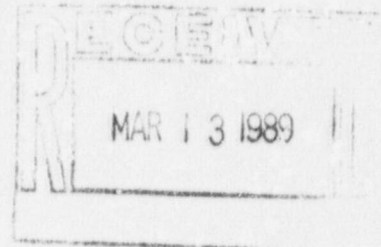
bcc distrib. by RIV:

RRI	R. D. Martin, RA
RPB-DRSS	Section Chief (DRP/A)
Lisa Shea, RM/ALF	RIV File
DRP	MIS System
RSTS Operator	Project Engineer (DRP/A)
DRS	J. E. Gagliardo
C. Harbuck, NRR Project Manager (MS: 13-D-18)	
C. Poslusny, NRR Project Manager (MS: 13-D-18)	
D. Keller	R. Vickrey
G. F. Sanborn, EU	



ARKANSAS POWER & LIGHT COMPANY

March 10, 1989



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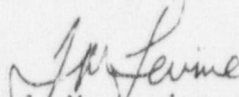
L. J. Callan, Director
Division of Reactor Projects
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

SUBJECT: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313/50-369
License Nos. DPR-51 and NPF-6
Response to Inspection Report
50-313/88-36 and 50-368/68-36

Dear Mr. Callan:

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

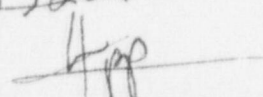
Very truly yours,


J. M. Levine
Executive Director
Nuclear Operations

JML:PLM:vgh
enclosure

cc w/encl: U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

IC-89/099

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IE01

Notice of Violation

A. Radioactive Material Transportation

Part 71.5(a) of 10 CFR requires that each licensee who transports licensed material outside the confines of its plant shall comply with the applicable requirements of the Department of Transportation (DOT) regulations appropriate to the mode of transport in 49 CFR Parts 170 through 189. Part 173.425(b)(1) of 49 CFR requires that material must be packaged in strong, tight packages so that there will be no leakage of radioactive material under conditions normally incident to transport.

Contrary to the above, on November 3, 1988, the licensee made a shipment of licensed radioactive material in a package that was not a strong tight package.

This is a Severity Level IV violation. (Supplement V) (313/8836-03; 368/8836-03)

Response to Violation 313/8836-03; 368/8836-03

(1) The reason for the violation if admitted:

AP&L does admit that the violation occurred as stated above. The reason that the package was not properly secured for transport is personnel error in that the Radwaste Supervisor did not follow procedural requirements for assuring proper packaging.

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

The Radwaste Supervisor was verbally reprimanded and counselled concerning his responsibilities and the failure to assure proper securing of the package. Additionally, the violation was discussed with the radwaste staff in a meeting subsequent to the event. The controlling procedure was reviewed and determined to be adequate for assuring proper packaging if followed by responsible personnel.

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

We believe that the actions taken as described above will prevent further violations in this area.

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

Full compliance was achieved November 7, 1988, when the package was received by the reactor services facility.

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

With the actions taken as described above, the tracking and controlling of job orders with outstanding Document Discrepancy Notices, while under the control of the Nuclear Quality department, should be adequate to prevent further violations in this area. The records management procedure indicates that each department manager has the responsibility to ensure that documents generated by his section are transmitted to Records for record retention. Documents in review are the responsibility of each department manager; therefore, each department is responsible for tracking and controlling documents while being reviewed by his department. We have not identified a generic concern with lost records in other departments; however, a memorandum will be issued by March 31, 1989, to all department managers providing the details of this violation and the actions taken by the Nuclear Quality department.

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

The procedure revision for QCO-2 was approved November 30, 1988, and the improved tracking was implemented, achieving full compliance.

Additional Information

AP&L has concerns with the violation as written, based on Regulatory Guide (RG) 1.88 and ANSI N45.2 with regard to the requirements of procedure QCO-2. These concerns, as presented below, were previously discussed with Mr. Dennis Kelley of your staff and members of my Plant Licensing staff on February 22 and 24, 1989.

Specifically, AP&L believes the references to control of records in accordance with RG 1.88 and ANSI N45.2.9 are inappropriate for citing a violation against implementing procedure QCO-2. This procedure is an internal departmental procedure which provides guidance to the Quality Engineering Group for review of documents and is not intended to address document control applications. Plant administrative procedure "Records Management" describes the application of the requirements of RG 1.88 and ANSI N.45.2.9. However, even in accordance with this procedure, documents in the process of being reviewed are not considered to be subject to the requirements of RG 1.88 and ANSI N45.2.9.

The portion of procedure QCO-2 addressed in the violation related to the closeout review of job orders. The job orders with outstanding Document Deficiency Notices against them were still under review and, therefore, not subject to the requirements of RG 1.88 and ANSI N.45.2.9.

B. Control of Job Order Review Process

Part 50, Appendix B, Criterion V states, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances."

Chapter 17.1.1 of the approved quality assurance plan requires that the control of records be in accordance with Regulatory Guide 1.88, Revision 2 of October 1976, which endorses ANSI N45.2.9-1974.

Contrary to the above, the implementing procedure QCO-2-QE, "Document Review," does not address the tracking and controlling of job orders with outstanding document deficiency notices written against them.

This is a Severity Level IV violation (Supplement I) (313/8836-04; 368/8836-04)

Response to Violation 313/8836-04; 368/8836-04

(1) The reason for the violation if admitted:

Although AP&L has concerns with the violation as written, which are discussed in an Additional Information Section following this response, AP&L does admit that process weaknesses in completed work documentation control resulted in a violation. Specifically, that permanent plant records (e.g., certain job orders) required to be maintained by Technical Specifications are apparently lost.

Regarding the job order packages reviewed during the inspection, several of these had been outstanding for an inordinate length of time, and, in fact, two of the job orders could not be located during the inspection (and have subsequently not been located and are apparently lost). As such, a weakness did exist in procedure QCO-2 with regard to tracking and controlling job orders returned to the work groups for correction of document deficiencies. The reason this weakness existed was that procedure QCO-2 did not contain provisions for formal transfer of the documents to the work groups and did not contain provisions for a formal review of the status of the job orders with outstanding Document Discrepancy Notices.

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

A procedure revision for QCO-2 has been issued which provides a more extensive method of tracking and controlling job order packages with outstanding document review discrepancies. A list of outstanding documents is maintained and reviewed periodically to identify the job order packages and the time period each has been outstanding. Memorandums are to be issued to departments when the packages have been outstanding for over 60 days, and are subject to higher levels of management for resolution.