



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

July 12, 1989

Docket

Docket No. 50-313

Mr. T. Gene Campbell
Vice President, Nuclear
Arkansas Power and Light Company
P. O. Box 551
Little Rock, Arkansas 72203

Dear Mr. Campbell:

SUBJECT: EMERGENCY OPERATING PROCEDURES GUIDELINES

Reference: L. J. Callan, "NRC Inspection Report No. 50-313/88-17," Letter from NRC Director, Division of Reactor Projects, Region II to Arkansas Power and Light Company, Docket No. 50-313, License No. DPR-51, July 25, 1988.

The NRC is inspecting emergency operating procedures (EOPs) at all plants containing B&W Nuclear Steam Supply Systems (NSSSs). At the plants inspected so far, including Arkansas Nuclear One, Unit 1 (ANO-1), the most significant deficiency found was the lack of suitable generic guidelines.

As you are aware, the B&W Owners Group (BWO) is supporting a generic emergency procedures guidelines (EPG) effort that should correct this deficiency. We recommend this generic approach because it is efficient and uses the knowledge of both B&W and the B&W NSSS owners. It has led to resolution of many of the old open issues that remain from the Abnormal Transient Operating Guidelines (ATOG) review. We originally understood that all B&W NSSS owners would use the results of the BWO program. However, we now understand that ANO-1 is not planning to adopt the new EPG program or use the program results.

Our EOP inspection report (see reference) stated that "...ANO had no NRC approved [generic] document to serve as a basis for development of the ANO-1 specific guidelines." We understand you are continuing to use the Oconee ATOG Part II as the licensing basis for your plant-specific EPGs. This has given the staff cause for concern because:

- ANO-1 has made many plant specific changes which are inconsistent with ATOG Part II.
- ANO-1 does not use ATOG Part I, and ATOG Part II is not a stand-alone, staff-approved generic document from which procedures may be generated. This is inconsistent with TMI action Item I.C.1. because ATOG Part II contains no operator guidelines. Further, most of the outstanding issues from ATOG Part I pertain to the bases for the EPGs, and a user of ATOG Part II would have to address each of these issues.
- ANO-1 never used certain sections of ATOG Part II.

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Additional concerns regarding the plant specific technical guidelines were also noted in the ANO-1 Procedure Generation Package Safety Evaluation Report dated June 23, 1989.

In order to facilitate resolution of our concerns regarding your continued reliance upon the ATOG Part II as the licensing basis for the ANO-1 plant specific technical guidelines, we propose to meet with you at our office in Rockville, Maryland in the near future. The specific date and time should be arranged through the ANO-1 NRR Project Manager. At the meeting you should be prepared to address (1) your program for resolution of the generic technical guidelines issues, and (2) your program for long-term maintenance of your plant specific technical guidelines and emergency operating procedures.

If your plans have changed, and you intend to adopt the B&W Owners Group EPG program, and use the program results, please inform us in writing immediately. In that case, a meeting may not be necessary. We believe that the BWOG EPG program will result in a better and more efficient resolution of the generic technical guidelines issue at B&W facilities.

Sincerely,

/s/

Frederick J. Hebdon, Director
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

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ACRS (10)	PD4 Plant File	W. Regan	D. Matthews
H. Berkow	J. Hannon	G. Knighton	J. Stolz
M. Hodges	W. Lyon		

DOCUMENT NAME: LTR/ANO EOP

*See previous concurrences:

PD4/LA*	PD4/PM*
PNoonan	CHarbuck:bj
07/06/89	07/06/89

F. Hebdon
 PD4/D
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 07/12/89

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L. Hannon
 LHH
 WRegan
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FHebdon
07/ /89

LHFB *[Signature]*
WRegan
07/ /89

Mr. T. Gene Campbell
Arkansas Power & Light Company

Arkansas Nuclear One, Unit 1

cc:

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Honorable Joe W. Phillips
County Judge of Pope County
Pope County Courthouse
Russellville, Arkansas 72801

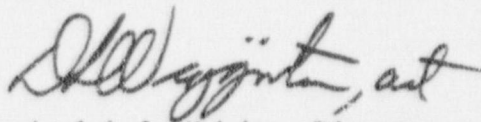
Ms. Greta Dicus, Director
Division of Environmental Health
Protection
Arkansas Department of Health
4815 West Markam Street
Little Rock, Arkansas 72201

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