

June 13, 1990

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U. S. Nuclear Regulatory Commission
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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
Response to Inspection Report
50-313/90-11; 50-368/90-11

Gentlemen:

Pursuant to the provisions of 10CFR2.201, attached is the response to the deviation identified during the inspection of activities associated with ANO's implementation of the guidelines for post-accident monitoring instrumentation contained in Regulatory Guide 1.97.

Very truly yours,



E. C. Ewing
General Manager,
Technical Support
and Assessment

ECE/RHS/sgw
Attachment

cc: Regional Administrator
Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

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Notice of Deviation

Generic Letter No. 82-33, "Supplement 1 to NUREG-0737 - Requirements for Emergency Response Capability," dated December 17, 1982, required all power reactor licensees to furnish proposed schedules for meeting each of the basic requirements identified in the enclosure. Section 6.2 of the enclosure required each licensee to submit a report describing how the guidance of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following An Accident," would be implemented. In addition, Section 6.2 of the enclosure required that:

"Deviations from the guidance in Regulatory Guide 1.97 (Rev. 2) should be explicitly shown, and supporting justification or alternatives should be presented."

By letter dated April 15, 1983, ANO committed to comply with these requirements concerning Regulatory Guide 1.97. Regulatory Position 1.4.b. of Revision 2 of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following An Accident" states:

"The instruments designated as Types A, B and C and Categories 1 and 2 should be specifically identified on the control panels so that the operator can easily discern that they are intended for use under accident conditions."

In deviation from the above, all of the applicable instruments in Unit 1 and approximately 12 of 32 of the applicable instruments in Unit 2 were not specifically identified. (313/9011-02; 368/9011-01)

Response to Deviation (313/9011-02; 368/9011-01)

1) Reason for the deviation:

This deviation occurred as a result of a difference in the interpretation of a statement contained in section 6.2 of Supplement 1 to NUREG-0737 regarding identification of deviations from the guidance contained in Regulatory Guide (RG) 1.97.

On June 25, 1984, ANO submitted a report to the NRC describing how it intended to meet the requirements of Generic Letter 82-33, "Supplement 1 to NUREG-0737 - Requirements For Emergency Response Capability". The report addressed the method of implementation of the specific criteria from RG 1.97 as required by section 6.2 of Generic Letter 82-33.

ANO interpreted the statement in section 6.2 to be relative to the information requested in that section, not to the entire RG 1.97. Consequently, the report identified only deviations from the criteria requested in section 6.2 and did not address all of the guidance contained in RG 1.97.

Since ANO's commitment is to NUREG-0737, Supplement 1, and because it implemented the requirements of the NUREG in accordance with its submittal, as ordered by the NRC, ANO believed it satisfied the requirements of Generic Letter 82-33 relative to RG 1.97.

However, during a telephone discussion with NRC Region IV and NRR personnel on June 12, 1990, ANO concluded that the NRC's position is that the statement in section 6.2 of Supplement 1 to NUREG-0737 regarding documentation of deviations is relative to RG 1.97 in its entirety, not only the specific criteria requested in section 6.2 of Generic Letter 82-33.

ANO agrees that identification of qualified post accident monitoring instrumentation and operator cognizance of the significance of these instruments is important. Therefore, actions have been initiated to address these concerns, as described below.

2) Corrective steps taken and the results achieved:

On April 27, 1990, a list of RG 1.97 Types A, B and C, Category 1 and 2 analog indicators was developed for both units. These instruments were then uniquely identified as post accident monitoring instruments by placing a 'green dot' on the control panel indicators of Units 1 and 2, and the simulators.

Reactor operators were trained with respect to the significance of these instruments and were required to 'walkdown' the list of RG 1.97 instruments prior to assuming their shift duties.

3) Corrective steps that will be taken to prevent recurrence:

- a) Further evaluations are being conducted to develop the optimum list of post accident instruments requiring unique identification on the control panels. This evaluation is expected to be completed by September 1, 1990.
- b) A program will be implemented by November 15, 1990, to control and maintain RG 1.97 instrument identification on control panels.
- c) The Operations training program is being evaluated and modified as necessary to ensure that the lesson plans include training information on RG 1.97 qualified instrumentation.
- d) A 'qualified instrument' checklist will be developed and added as an attachment to the Reactor Operator qualification guide.
- e) Simulator scenarios that include a Loss of Coolant Accident or steam leak inside containment will include malfunction of one or more non-qualified instruments pertinent to the transient in progress.

- f) Simulator practice and exercise guides will be developed to emphasize use of qualified instruments to determine plant conditions during LOCA/steam leaks inside containment.
- g) ANO is performing an evaluation to determine if further clarification of its position relative to Generic Letter 82-33 compliance is necessary. The results of the evaluation will be provided to you by July 31, 1990.

4) Date of full compliance:

Full compliance with the specifics of this deviation was achieved on April 27, 1990, by the placement of 'green dots' on the control panel indicators of both units which are required to be identified by RG 1.97.

The operator training program enhancements discussed above are expected to be completed by June 30, 1991.

Any further actions determined to be necessary as a result of on-going evaluations will be documented in future correspondence.