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July 20, 1990

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U. S. Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

SUBJECT: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313/50-368
License Nos. DPR-51 and NPF-6
Additional Response to Inspection Report
50-313/88-47; 50-368/88-47

Gentlemen:

Thank you for the clarification of notice of violation 313/8847-05 which you provided in your letter dated June 22, 1990 (0CNA069018). After review of the NRC Staff position and other associated documents, it is evident that containment isolation valve CS-26 does require Type C (local leak rate) testing per the requirements of 10CFR Part 50, Appendix J. Accordingly, an additional response to the violation is provided pursuant to the provisions of 10CFR.201.

Very truly yours,

E. C. Ewing
General Manager,
Assessment

ECE/DWB/sgw
Attachment

cc: Regional Administrator
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

IE01
1/1

Notice of Violation

Failure to Perform a Type C Leakage Rate Test on Containment Isolation Valve Pursuant to 10 CFR Part 50, Appendix J

10 CFR Part 50, Section 50.54(O) requires that the primary reactor containment shall be subject to the requirements of 10 CFR Part 50, Appendix J.

Appendix J requires that periodic leak testing of the systems penetrating the primary containment be conducted.

Contrary to the above, the inside containment isolation Check Valve CS-26, associated with containment penetration P39, was found on December 15, 1988, to have not been subject to applicable Appendix J Type C testing.

This is a Severity Level IV violation. (Supplement I)(313/8847-05)

1. The reason for the violation;

ANO's interpretation of 10CFR50 Appendix J and the ANO-1 Technical Specifications concluded that Type C testing was not required for CS-26 because the valve did not meet the criteria for valves that are subject to Type C testing per paragraph II.H of Appendix J and ANO-1 Technical Specification 4.4.1.2.1, item e, f, and g, therefore, the valve was not Type C (Local Leak Rate) tested. This interpretation was incorrect, in light of the Staff position that check valve CS-26 is "required to close automatically upon receipt of a containment isolation signal in response to controls intended to effect containment isolation". Given this interpretation, check valve CS-26 does require Type C testing and failure to do so violated the requirements of 10CFR50 Appendix J.

2. Corrective steps which have been taken and the results;

In response to the identified concern, a special Work Plan was developed and CS-26 was local leak rate tested on February 16, 1989. The As-Found LLRT resulted in a 650 accm (absolute cubic centimeters per minute) leakage rate. Maintenance was performed on CS-26 and an As-Left LLRT was performed with a resultant 4.199 accm leakage rate. The 650 accm As-Found leakage rate, when added to the total known Type B & C leakages (1497.972 accm at the time) resulted in a total leakage rate of 2147.972 accm. This total does not approach the ANO-1 Technical Specification limit for the total B & C leakage of 44,023 accm and, therefore, was not safety significant.

It should be noted that this violation was identified in December 1988. In February 1989, LLRT of all the ANO-1 containment isolation check valves was completed. The total leakage from the check valves was added to the total known Type B & C leakage rate. The total Type B & C leakage, including the check valve leakages, was determined to be 9848.195 accm, which is well below the Technical Specification limit of 44,023 accm.

Additionally, during the ANO-2 seventh refueling outages (Fall 1989), all the ANO-2 containment isolation check valves were tested per ANO-2 LLRT procedure 2305.17 for information only. The leakage rates of all containment isolation check valves were included as part of the Type B & C total of 2845.199 accm, which is well below the ANO-2 Technical Specification limit of 20,990 accm.

3. The corrective steps which will be taken to prevent recurrence;

The ANO-1 Type C test procedure 1305.18 will be revised to include local leak rate testing of CS-26 along with all other containment isolation check valves that are a part of a Type C testable penetration.

Additionally, the corresponding ANO-2 containment isolation check valves will be included in the ANO-2 Type C test procedure 2305.17. Also, a Technical Specification change request will be submitted to delete the exemption for Type C testing these ANO-2 containment isolation check valves.

4. The date of full compliance

ANO-1 Local Leak Rate Test procedure 1305.18 will be revised to include local leak rate testing of containment isolation check valves by October 1, 1990, which is prior to the next scheduled ANO-1 refueling outage.

ANO-2 Local Leak Rate Testing procedure 2503.17 will be revised to include local leak rate testing of containment isolation check valves by February 1, 1990, which is prior to the next scheduled ANO-2 refueling outage.

The ANO-2 Technical Specifications change request will be submitted by October 30, 1990.