

Appendix A
NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted on March 7-13, 1978, it appears that certain of your activities were not conducted in full compliance with your Reactor License or NRC requirements as indicated below:

A. Failure to Follow the CILRT Procedure

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be accomplished in accordance with documented instructions.

Technical Specification 6.8 for Arkansas Nuclear One (ANO), Unit No. 1, requires that written procedures be established, implemented and maintained for surveillance and test activities of safety related equipment.

Section III of the Containment Leak Rate Test Procedure 1304.31, requires that each phase of the test be performed in the proper sequence before a new phase is initiated.

Contrary to the above:

On March 10, 1978, at 9:00 p.m. the inspector observed that the test activities had progressed into Phase 3, "Local Leak Survey at 14 psig"; however, the test copy of the procedure indicated that:

1. Step B.12 of Phase 1, "Test Preparations" had not been signed as complete. This step was to indicate that valve lineups had been completed in accordance with Appendix B.
2. Appendix B to the test procedure, which documents valve lineup for the test was incomplete in that one item on page B-9 was not signed off, and twenty pages had missing dates for the lineup of the valves. The test director indicated that the one item not signed off was still in progress.
3. Eight of the ten sequential steps in Phase 2, "Pressurization to 14 psig," were not signed to indicate completion even though the test had proceeded to Phase 3.

After the inspector informed the licensee of his observations, the test director corrected the above by changing step B.12 of Phase 1 and by signing as completed all steps not previously signed.

This is an infraction.

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B. Failure to Adequately Execute QC Surveillance of CILRT

10 CFR 50, Appendix B, Criterion X requires that a program for inspection of activities affecting quality be established and executed to verify conformance with procedures.

Arkansas Power & Light Topical Report APL-TOP-1A, in Section 10, requires that the Quality Control Engineer or his designated representative perform required inspections within the plant and accomplish inspections in accordance with written inspection procedures.

Contrary to the above:

The licensee did not adequately execute the Quality Control (QC) surveillance for the CILRT test activities, in that the QC organization had neither read nor reviewed the test procedure prior to initiation of the test on March 10, 1978, and had not prepared a documented surveillance plan nor a schedule identifying key test features. This was evidenced by the absence of QC surveillance during the valve line-ups, during the test pressure exterior leakage survey and during the initiation of the verification test.

This is an infraction.