Arkansas Power & Light Company Arkansas Nuclear One, Unit 1 Docket No. 50-313

## APPENDIX A

## NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted February 13-16, 1978, it appears that certain of your activities were not conducted in full compliance with your Reactor License or NRC requirements as indicated below:

1. Technical Specification 6.8.1 states in part, "Written procedures shall be established, implemented, and maintained covering the activities referenced below: a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972 . . . "

Regulatory Guide 1.33, Section B.10, "Preparation for Refueling, Refueling Equipment Operation, and Core Alterations," is implemented, in part, by plant procedure 1502.04, revision 2, which requires that neutron count rate be recorded in the Chronological Log following loading of each fuel assembly into the core and prior to subsequent loading.

Contrary to the above, the licensee failed to record the neutron count rate following the loading of fuel assemblies prior to about 1550 hours on February 15, 1978.

This is an infraction.

2. Criterion II of Appendix B to 10 CFR 50 requires that activities affecting quality shall be accomplished under suitably controlled conditions, including assurance that all prerequisites for the activity have been satisfied. This is amplified by Section 2.4.2 of the licensee's NRC approved Quality Assurance Manual-Operations.

Contrary to the above, the licensee failed to control and coordinate quality related activities during refueling operations in that on February 15, 1978, one channel of source range nuclear instrumentation was rendered inoperable during the time when fuel movements were scheduled. Technical Specification 3.8.2 requires two independent channels of source range instrumentation in operation whenever core geometry is being changed.

This is an infraction.

3. Technical Specification 6.8.1 requires that "Written procedures shall be established, implemented and maintained covering . . . surveillance and test activities of safety related equipment . . . " Technical Specification Table 4.1-2 requires that reactor coolant leakage be evaluated daily to assure conformance to the allowed leakage rates of Technical Specification 3.1.6. Procedure 1103.13 "Reactor Coolant System Leak Rate Determination" has been written by the licensee to prescribe the method of determining reactor coolant system leakage to demonstrate conformance to Technical Specification 3.1.6.

Contrary to the requirement of technical specification 6.8.1 that such procedures be maintained, numerous calculations of reactor coolant leakage that were made between November 2, 1977, and February 3, 1978, included a correction for controlled leakage. The method to be used in determining such a correction, including the precautions to be observed to ensure a conservative correction was determined, were not included in procedure 1103.13.

This is an infraction.

4. Technical Specification 4.4.1.4 requires that remotely operated reactor building isolation valves be stroked to the position required to fulfill their safety function every three months, unless such operation is not practical during plant operation.

Contrary to this requirement, valve CV-1065, a reactor building isolation valve whose normal position is open, was not included in procedure 1304.70, "Reactor Building Isolation Valve Stroke Test." Stroking of this valve during operation is not impractical. It thus could not be demonstrated that this valve had been tested at the required three month intervals.

This is an infraction.