

U. S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT  
REGION IV

IE Inspection Report No. 50-313/75-15

Docket No. 50-313

Licensee: Arkansas Power & Light Company  
Sixth & Pine Streets  
Pine Bluff, Arkansas

License No. DPR-51

Category C

Facility: Arkansas Nuclear One, Unit 1

Location: Russellville, Arkansas

Type of License: B&W, PWR, 2568 Mwt

Type of Inspection: Routine, Unannounced

Dates of Inspection: December 3-5, 1975 and December 8-9, 1975

Dates of Previous Inspection: November 10-14, 1975

Reactor Inspector:

T. F. Westerman  
T. F. Westerman, Reactor Inspector

12-22-75  
Date

Accompanying  
Personnel:

R. Smith  
R. Smith, Reactor Inspector

12-19-75  
Date

J. E. Gagliardo  
J. E. Gagliardo, Reactor Inspector

12/19/75  
Date

Reviewed By:

G. L. Madsen  
G. L. Madsen, Chief, Reactor Operations and  
Nuclear Support Branch

12/25/75  
Date

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SUMMARY OF FINDINGS

A. Enforcement Action

1. Items of Noncompliance

Infractions

- a. Contrary to 10 CFR 50, Appendix B, Criterion X and Section 2 of the Arkansas Power and Light Quality Assurance Manual Operations (APL QAMO) and QCP 1004.08, the inspector did not find that inspection of Job Orders, Preventative Maintenance, and Preservice Inspection was performed. (DETAILS, paragraphs 13.b.1 and 13.b.2)
- b. Contrary to 10 CFR 50, Appendix B, Criterion V and Section 5 of the APL QAMO:
  - (1) Subsequent revisions to the initial issue of procedure 1304.58 were issued without review by the Plant Safety Committee (PSC) as required by Section 5.2 of 1304.58. (DETAILS, paragraph 13.b.3)
  - (2) The final Preservice Inspection Report was not reviewed by the PSC as required by section 5.6 of 1304.58. (DETAILS, paragraph 13.b.3)
  - (3) Departmental Test Control Charts were not being maintained by the Technical Services Department and were not being maintained current by the Maintenance Department as required by QCP 1004.12, Section 3.1.2. (DETAILS, paragraph 3.b.2)
- c. Contrary to Criterion IV, Appendix B, 10 CFR 50, primary and secondary coolant chemicals were not specified as "Q" items and controlled as required by ANO Unit 1's Quality Assurance Manual. (DETAILS, paragraph 9)
- d. Contrary to Technical Specification 6.7, a change to a maintenance procedure for venting the control rod drive mechanisms was made without review by the Plant Safety Committee and approval by the Plant Superintendent. (DETAILS, paragraph 8)

B. Licensee Action on Previously Identified Enforcement Items

Not inspected.

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C. Design Changes

None.

D. Unusual Occurrences

None.

E. Other Significant Findings

1. Current Findings

a. Unresolved Items

(1) 7515-01 In-service Inspection

An approved plan and schedule have not been issued.  
(DETAILS, paragraph 13.b.3)

(2) 7515-02 10 CFR 50.59 and Tests and Equipment

The inspector could find no procedure requirements for safety analysis or report for tests and experiments in accordance with 10 CFR 50.59. (DETAILS, paragraph 3.b.3)

(3) 7515-03 Calibration Control

The licensee was in the process of establishing requirements for as found as left calibration data. The inspector found no procedural requirements for segregation of nonconforming test equipment. The inspector did find that three pieces of test gear had been tagged out of service with unofficial tags. (DETAILS, paragraphs 4.b.2 and 4.b.3)

(4) 7515-04 Hydrostatic Test Procedures

Licensee did not have available for the inspector's review a Hydrostatic Test Procedure for the Building Spray and Residual Heat Removal Systems. (DETAILS, paragraph 8)

2. Status of Previously Reported Unresolved Items

7514-1 Plant Safety Committee Review of Temporary Procedure Changes

The inspector verified that all of the temporary procedure changes which were identified in inspection 75-14 as being in effect for more than one year have been reviewed by the Plant Safety Committee. This item is closed.

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7514-2 Preventative Maintenance Activities

The inspector found no preventative maintenance activities involving safety related components which had been accomplished without an approved procedure. Several items were considerably overdue, but the licensee plans extensive changes to the program to make it more workable. This item remains open.

F. Management Meetings

1. Entrance Interview

An entrance interview was held with Mr. J. W. Anderson at the beginning of each portion of this inspection on December 3 and again on December 8, 1975. The inspectors stated that the purpose of this inspection was to continue the Quality Assurance Program implementation inspection which was begun on November 10, 1975. The inspector outlined the scope of their planned inspection efforts.

2. Exit Interview

An exit interview was conducted with Mr. J. W. Anderson and members of his staff at the conclusion of each portion of the inspection on December 5 and December 9, 1975. The inspectors discussed the scope of the inspection and the findings as summarized above.

Licensee representative said that the review and revision of the preventative maintenance program would be completed by June 1, 1976. The inspector stated that the program would be reviewed after the revisions have been completed.

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DETAILS

Persons Contacted

Arkansas Power & Light Company (AP&L)

J. W. Anderson, Jr., Plant Superintendent  
G. H. Miller, Assistant Plant Supervisor  
B. A. Terwilliger, Supervisor of Plant Operations  
T. Baker, Chemistry & Environmental Supervisor  
V. Kinsey, Secretary, PSC  
T. Martin, Maintenance Supervisor  
L. W. Humphrey, Quality Assurance Engineer  
C. N. Shively, Performance Engineer  
C. A. Halbert, Technical Support Engineer  
P. Jones, Instrument and Controls Supervisor  
B. Baker, Assistant Maintenance Supervisor  
J. Crowe, Store Room Supervisor  
L. Alexander, Quality Control Inspector  
J. L. Orlicek, Quality Control Engineer  
T. Green, Assistant Training Coordinator

Subjects Inspected

1. Purpose of Inspection

This inspection was conducted as a follow-on inspection to Inspection No. 75-14 to ascertain that the staff of AP&L has developed and is implementing the Quality Assurance Program as outlined in their manual approved by NRC letter, Vollmer (NRC/DRL) to Phillips (AP&L), dated May 12, 1975.

2. Control of Special Process

a. Scope of Inspection

The inspector reviewed the licensee's Quality Assurance Program to determine that the controls of special processes, commensurate with 10 CFR 50 Appendix B, Criterion IX, and Section 9 of the AP&L Quality Assurance Manual for Operations, has been delineated.

b. Inspection Findings

1. Quality Control Procedure 1004.07 Control of Special Processes was found by the inspector to establish requirements consistent with the above licensee commitments. The licensee has, for the present, employed outside contractors to perform activities relating to special processes, i.e., welding and nondestructive testing. The licensee has not developed a program or procedures for company personnel.

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2. The licensee stated that outside contractors are qualified in accordance with ANO-3 Surveillance Audits. The inspector found that this procedure does provide for qualifications of outside contractors in the area of special processes.
3. Further inspection of the AP&L in-house program for special processes will pend the development of such a program by the licensee.

3. Test Control

a. Scope of Inspection

The inspector reviewed the licensee's Quality Assurance Program to determine that Test Control requirements, commensurate with 10 CFR 50, Appendix B, Criterion XI and Section 11 of the AP&L Quality Assurance Manual for Operations, have been delineated.

b. Inspection Findings

1. Requirements for master schedules have been specified for surveillance testing and inservice inspection in QCP 1004.12 Operational Test Control. A master schedule for inservice inspection had not yet been provided. This item will be subject to further inspection.
2. During review of QCP 1004.12, the inspector found that item 3.1.2 of this procedure requires that, "To ensure that the required tests are performed within the specified interval each Plant Supervisor designated on the Master Test Control List shall be responsible for establishing and maintaining a Departmental Test Control Chart. The Test Control Chart shall list all required tests under the cognizance of that department, the test interval, schedule date and actual date performed." The inspector reviewed the Department Test Control Chart maintained by the following departments: Maintenance, I&C, Operations, and Technical Support. The inspector found no Department Test Control Chart for Technical Support to include schedule date and date performed. Technical Support is responsible for annual filter testing, reactor building leakage, pressurizer code safety valve setpoint, main steam safety valve setpoint, and inservice inspection of the reactor coolant system. The Maintenance Departmental Test Control Chart was found to be incomplete in that completion dates for station batteries and switch yard batteries (Surveillance Procedure 1405.01) quarterly tests were indicated only once during the four tests performed in 1975. Schedule dates, or completion dates, were not shown for Reactor Building Tendon Integrity (Surveillance Procedure 1304.87) and the Main Feedwater lines at the Reactor Building Penetration Gap Measurement between the pipe and annulus for which no

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surveillance procedure had been prepared and which was found by the inspector to be due in December 1975. This is considered an item of noncompliance.

3. The inspector did not find that procedural requirements had been established to assure that proposed tests and experiments will be reviewed (safety analysis) and reported in accordance with 10 CFR 50.59. This is considered an unresolved item.

4. Control of Measuring and Test Equipment

a. Scope of Inspection

The inspector reviewed the licensee's Quality Assurance Program to determine that Control of Measuring and Test Equipment was commensurate with 10 CFR 50, Appendix B, Criterion XII and Section 12 of the AP&L Quality Assurance Manual for Operations.

b. Inspection Findings

1. The inspector found that QCP 1004.10, Calibration Control, does in general conform to the above commitments.
2. One area was identified by the inspector that will be followed up on during subsequent inspections. This item deals with the as found and as left condition of test equipment during calibration. The licensee was in the process of revising on-site data sheets to assure that this data is provided. The most current purchase order (PO 16140/12-3-75) requesting outside calibration of AP&L standards was also found by the inspector to request a "before and after calibration report." Procedural requirements have not been established. This item is considered unresolved.
3. The inspector could find no procedure for segregation and identifying nonconforming test equipment. Section 5.5 of QCP 1004.01 does require evaluation of out of calibration equipment and reporting to appropriate management of such conditions; however, there are no apparent requirements for segregation to prevent the inadvertent use of nonconforming test equipment as required by 10 CFR 50, Appendix B, Criterion XV and Section 15 of the AP&L Quality Assurance Manual Operations. This is considered an unresolved item.

5. Handling, Storage and Shipping

a. Scope of Inspection

The inspector reviewed the licensee's Quality Assurance Program to determine that requirements for handling, storage and shipping

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commensurate with 10 CFR 50, Appendix B, Criterion XIII and Section 13 of the licensee's Quality Assurance Manual Operations have been established.

b. Inspection Findings

The inspector found that the licensee was in apparent compliance with the above commitments.

6. Inspection, Test and Operating Status

a. Scope of Inspection

The inspector reviewed the licensee's Quality Assurance Program to determine that requirements for Inspection, Test, and Operating Status, commensurate with 10 CFR 50, Appendix B, Criterion XIV and Section 14 of the licensee's Quality Assurance Manual Operations, have been established.

b. Inspection Findings

The inspector found the licensee in apparent conformance with the above commitments with exception of status of the inspection of preventative maintenance activities. (See DETAILS, paragraph 13 of this report with regard to inspection of preventative maintenance.)

7. Calibration

a. Scope of Inspection

The inspector verified program implementation with regard to test equipment calibration as specified in QCP 1004.10. Four pieces of test equipment were selected (DRS-Ø1/Decade Resistor, TC Ø1/Timer-Counter, PAS-Ø1/Picoampere Source, DVM-Ø4/Digital Voltmeter) and reviewed to determine:

- Each piece was identified on the master inventory.
- Calibration procedures had been provided.
- Calibration schedule being met.
- Calibration accuracy traceable to NBS or equivalent.
- Storage of test equipment.

The inspector verified by direct questioning of plant technicians their knowledge of plant controls relating to the following:

- Controls which prohibit use of out of specification test and measuring equipment.
- Controls which require review of out of specification equipment.
- Controls which require documentation of out of specification equipment.

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The inspector verified the qualifications of two technicians who perform calibrations.

b. Inspection Findings

1. The inspector found the handling of the four pieces of test equipment identified above to be consistent with QCP 1004.10 in the areas identified.
2. During the direct questioning of plant technicians, the inspector did not find that plant technicians appeared aware of the existence of Quality Control Procedures relating to administrative control for test and measuring equipment. The plant technicians did, in all cases, respond that out of specification or damaged test and measuring equipment are referred to the appropriate supervisor. At the exit meeting, the licensee stated that training lectures had been presented to plant personnel which summarized the licensee's QC Program. The licensee stated that lectures were not intended to be given to personnel on the specific QC procedures.
3. Three pieces of test equipment, SN 67260 - Dead Weight Testor/Instrument Shop, DPG-02 - Differential Pressure Gauge/Instrument Shop, and TES-01/SCR Testor/Meteorology Laboratory, were identified to the inspector as being out of specification. The inspector found that unofficial paper tags with out-of-service had been placed on each. The inspector found that the licensee's QA Program provides no requirements for segregating or otherwise identifying out of specification equipment. (See DETAILS, paragraph 4.b.2.) The licensee did indicate, with regard to these particular test instruments, that the calibration tags had been removed.

8. Review of Maintenance Job Orders

A detailed review of the following job orders was accomplished to determine if "Q" listed related jobs were being inspected as required by Quality Assurance Procedure 1004.08 - QC Inspection, and 1004.14 - Initiation and Processing of Job Orders.

<u>Job Order No.</u>	<u>Job Order Title</u>
0951	Replace Gaseous Waste Discharge Filter
0952	Hydro Building Spray Crossover Line
0953	Seal Supply Drain Lines
0954	Valve Packing
0955	Sluice Gate #1
0956	Reactor Coolant System Leaks
0958	Packing Leak

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<u>Job Order No.</u>	<u>Job Order Title</u>
0960	Replace Handle Pin
0961	Replace Reactor Coolant Pump Seals
0962	Replace Relay and Test
0963	Hydrostatic Test of Decay Heat System and Reactor Building Spray System
0965	"B" Core Flood Tank Valve Packing Leak
0966	Reactor Coolant System Flow Transmitter Root Valve Leak
0967	Replace Spring in Check Valve in Reactor Building Spray System
0968	Valve CV 1428 Circuit Breaker Trip Investigation
0969	"B" Makeup Pump Drain Line
0970	Vent Control Rod Drive Mechanism
0922	Spring Holder Repairs
0974	Repair Valve CV 1213
0975	Repair Counter for Circulation Pumps
0977	Level Transmitter Isolation Valves

A cursory review of Job Orders from 0851 to 0990 was conducted and the characteristics inspected were not documented on Form QC 2 as required in Quality Assurance Procedure 1004.08. Greater than 75% of the Job Orders reviewed were designated "Q" related work.

Job Order number 0970 Vent Control Rod Drive Mechanisms, Step 5.14 of the included procedure states, "obtain a new vent plug "O" ring, lubricate it with an appropriate lubricant as in Step 3.2 of this attachment." This section of the procedure had a line drawn through it and a note on the procedure stated, "replaced on last venting." These changes were made to this maintenance procedure without having been approved as required by Technical Specification 6.7. This is considered an item of noncompliance.

Job Order 0963 Hydrostatic Test of Decay Heat System and Reactor Building Spray System did not require or include, as part of the Job Order, a maintenance procedure for accomplishing the Hydrostatic tests. In interviews with the licensee personnel it was stated by the licensee that the evolution was performed to a procedure. This item is considered unresolved pending recovery of the procedure for these hydrostatic tests.

9. Procurement Control, Receiving Inspection and Storage

The procurement, storage, handling and receiving of safety related equipment and materials was inspected to verify conformance with the requirements of the following:

Arkansas Nuclear One Quality Assurance Manual for Operations

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10 CFR 50, Appendix B, Criteria IV, VI, VII, VIII and XIII as related to the subject of this section.

Arkansas Nuclear One Quality Assurance Procedures  
1004.05 - Purchase Requisition Preparation and Processing  
1004.06 - Material Receiving and Inspection  
1004.18 - Material Identification

The inspection effort consisted of the following:

- a. Interviewed selected licensee personnel responsible for procurement and control of safety equipment and material to determine their level of understanding of their related responsibilities, and understanding ANO-Unit 1 procedures.
- b. Randomly selected recently purchased safety-related items and some long time stored components to determine that:
  1. Approvals of procurement documents were in accordance with Quality Assurance Procedures.
  2. The items were purchased from qualified vendors.
  3. Procurement documents contain or reference the component and material identification requirements, drawings, specifications, codes and industrial standards, test and inspection requirements, and special process instructions for such activities as welding, heat treating, nondestructive testing, and cleaning.

Procurement documents also identify the documentation (e.g., drawings, specifications, procedures, inspection and fabrication plans, inspection and test records, personnel and procedure qualifications, and material chemical and physical test results) to be prepared, maintained, and submitted, as applicable, to the purchaser for review and approval.

That these documents contain the procuring agency's right of access to supplier's facilities and records for source inspection and audits.

These requirements were met by invoking the Architectural Engineer's procurement specifications on the supplier.

4. Items released to store and use are identified as to their acceptance status.
5. That the items have been properly dispositioned in accordance with the Quality Assurance Procedure 1004.06 - Materials Receiving and Inspection.

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6. Supplier records, as required by the purchase document, are available and complete.
7. Inspection at receipt is completed and signed off as required by procedures.
8. Items can be traced to the procurement document and inspection records.

Primary Coolant and Secondary Steam Generator chemicals, such as Boric Acid, Hydrogen, Nitrogen, Hydrazine and Ammonium Hydroxide, were not identified and controlled as "Q" list items. "Q" list items are defined in ANO-1 Quality Assurance Manual as a list of items which specifically identifies those structures, systems, and components whose failure could cause an uncontrolled release of radioactivity, or those essential for the safe shutdown and immediate and long-term operation following a loss of coolant accident.

The following was not accomplished in the procurement control and use of primary and secondary chemicals:

1. Vendor/Suppliers were not qualified.
2. Source inspections were not performed.
3. Purchase documents do not have product specifications listed.
4. Receiving inspections were not performed to written instructions.
5. Storage requirements were not documented.

This is considered an item of noncompliance to 10 CFR 50, Criterion IV, which states, "Measures shall be established to assure that applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality are suitably included or referenced in the documents for procurement of material, equipment, and services, whether purchased by the applicant or by its contractors or subcontractors."

10. Licensee's Action Following the Bomb Threat of December 8

At approximately 7:30 a.m. on December 8, 1975, the licensee received a bomb threat from an unidentified individual. The threat was received by telephone in the guard shack at the construction entrance of Unit 2. The caller said that a bomb is set to go off in the turbine building at 10:05 a.m.

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The licensee's initial action was to begin the recall of personnel and the assembly of emergency teams in accordance with Emergency Procedure 1202.34, Personnel Response and Accountability. The four emergency teams designated in this procedure were assembled and each team was given instructions to search specific areas of the facilities of Unit 1. Operations personnel who were not assigned to the emergency teams were assigned areas in Unit 2 which they were to search.

After the emergency teams had been dispatched, the Plant Superintendent called the following offices in accordance with the requirements of the above procedure:

- a. Arkansas Power and Light supervisory personnel in Little Rock.
- b. QA and Startup Group personnel at the Unit 2 site.
- c. Local Sheriff's department.
- d. Local FBI agent.
- e. Region IV Office of Inspection and Enforcement, US NRC, Arlington, Texas.

The licensee's records indicated that the above calls were made within the time interval of 8:15 a.m. to 8:50 a.m.

A licensee representative stated that all of the search teams reported negative findings before the physical plant evacuation which was initiated at 9:35 a.m. All Operations, QA and Startup Testing personnel were accounted for at 9:40 a.m. and all Construction personnel were accounted for at 9:51 a.m.

The inspectors arrived on-site a few moments before the evacuation and verified that the plant had been evacuated. Since no bomb was found, the licensee sounded the "all clear" at 10:30 a.m.

A licensee representative told the inspector that they planned to evaluate possible changes in their emergency procedure which were indicated by this event.

No discrepancies were noted in the licensee's handling of this event.

11. Preventative Maintenance

During the previous inspection (75-14), the inspector reviewed the licensee's controls of preventative maintenance (PM). The inspector found that the licensee had a computer controlled PM program which was being used to schedule and record the preventative maintenance activities for the facility. The inspector had found that the licensee had no

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procedures for administering the PM program and licensee representatives had stated that there existed no procedures for conducting PM maintenance items because the maintenance was not safety related. The inspector had identified this matter as an unresolved item and stated that he would, during a future inspection, review the list of PM items to determine if maintenance is included in the PM program which involves nuclear safety of the facility.

During this inspection, the inspector reviewed the list of PM items for the following areas:

Operations  
Mechanical  
Electrical  
Instrumentation and Control  
Health Physics

From the above lists of PM items the inspector selected 22 maintenance items which appeared to be safety related. The inspector found that most of the PM items selected did reference a maintenance procedure which was also reviewed and found to be adequate. Of the remaining PM items, the inspector found that only two of them involved safety related maintenance. Licensee representatives said that there was no procedure for these two maintenance items. They noted, however, that the subject maintenance had not been accomplished, and an approved written procedure would be issued for these items prior to initiation of the work.

The two maintenance items discussed above are:

- a. Annual disassembly and inspection of Reactor Building Spray Pumps
- b. Semiannual disassembly and inspection of the Emergency Diesel Air Compressors.

The inspector expressed concern that the above maintenance items had been scheduled by the licensee's program and had not been accomplished. The inspector also noted that in his review he had discovered other maintenance items which had been scheduled but had not been accomplished. Licensee representatives told the inspector that the PM program had been developed by a consultant and contained many maintenance requirements which they did not believe to be necessary or which could not be accomplished within the frequency specified by the program. The licensee representatives said that the program was in the process of being reviewed and corrected to establish a program which would satisfy their needs and the requirements of Regulatory Guide 1.33 and ANSI Standard N 18.7.

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Licensee representatives stated during the exit interview that the PM program revisions would be completed by June 1, 1976. The inspector stated that the above unresolved item would remain open until the PM program has been revised and subsequently reviewed by the inspector.

12. Temporary Procedure Changes

During the previous inspection (75-14), the inspector reviewed temporary changes which had been issued for several of the licensee's procedures. The inspector found that the temporary changes had been issued in accordance with the approved procedures. Fourteen of the temporary changes which were reviewed had been in effect for more than one year, and in accordance with the licensee's Quality Assurance Manual, should have been reviewed by the Plant Safety Committee (PSC). The inspector stated that the PSC reviews would be verified at a future inspection and identified this as an unresolved item.

During this inspection, the inspector verified that the above temporary procedure changes had been reviewed by the PSC. The initial reviews of temporary procedure changes are conducted concurrently with the annual review of all procedures. The review is conducted by one of the facility supervisors who is assigned as a one-man PSC subcommittee to review selected procedures. The supervisor reviews the procedures assigned and their associated temporary changes for their (1) compliance to the TS and FSAR commitments; (2) effect on safe operation of the plant; and (3) technical content. The supervisor then reports the results of his review to the PSC along with his recommendations on the disposition of the temporary changes. The report is reviewed by the PSC at a future meeting.

The inspector expressed his concern about reviewing temporary changes in this manner. He noted that, by using the above method of review, the PSC membership may not conduct a personal review of each temporary procedure change. Licensee representatives stated that use of the above review methods did not preclude individual PSC members from personally reviewing the temporary changes if they so desire. They noted that the supervisor assigned to conduct the detailed review of the procedures and changes was that supervisor having the expertise in the area covered by the procedures.

The licensee representatives also stated that a proposed TS change was in the process of being submitted which would require that temporary procedure changes be reviewed during the meeting of the PSC immediately following issuance of the change. The inspector said that such a change would satisfy his concerns about the licensee's methods of reviewing temporary procedure changes.

13. Inspection

a. Scope of Inspection

The inspector reviewed the licensee's Quality Assurance Program to determine that inspections, commensurate with 10 CFR 50, Appendix B,

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Criterion X, and Section 10 of the AP&L Quality Assurance Manual for Operations have been delineated.

b. Inspection Findings

1. Quality Control Procedure (QCP) 1004.08, QC Inspections, was found by the inspector to provide guidance for inspection planning, performance of inspections, and reporting. The inspector found, however, that inspection hold points are required only if post inspection cannot be performed. The inspector did not find that QCP 1004.08 delineates what inspections are mandatory and the basis and depth that inspections are to be performed. The inspector found that Section 10 of AP&L Quality Assurance Manual, item 10.1.3, identifies quality related activities subject to inspection and includes a list of seven activities. The inspector found that only item "4) Receipt of Q-List Materials, Parts or Components" which is governed by QCP 1004.06, Material Receiving and Inspection, requires mandatory inspection. Maintenance activities, including repair, replacement and special maintenance, are initiated as Job Orders in accordance with QCP 1004.14, Initiation and Processing of Job Orders. The inspector could find no mandatory inspection provisions within this procedure.

Section 4.4 of QCP 1004.14, does require that, "In general, any maintenance work completed requires checkout prior to returning the equipment to service." The inspector did not find that it was apparent that records required by 10 CFR 50, Appendix B, Criterion XVII to include, "type of observation, the results, the acceptability" or that appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished as required by Criterion V are identified. The only documentation of checkout is the initials of the assigned person on Item 15 of the Job Order. The only exception would be if a maintenance procedure, design change document, or special instruction had been provided which delineates inspection requirements.

The QC engineer receives the Job Order only after work has been approved to commence. Documentation of inspection is accomplished by form QC-2 in accordance with QCP 1004.08. The licensee stated that he was not aware that form QC-2's had been completed by any personnel other than the QC Engineer. The inspector questioned that a staff of three could cover all the required inspection of safety related activities. The licensee stated that the inspection of each Job Order associated with Q-Listed item is not intended by QCP 1004.08. The inspector did find

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that Section 2 of the AP&L Quality Assurance Manual for Operations, Table 2-2, states with regard to QCP 1004.08, "This procedure provides guidance for inspection planning (including inspection hold points), performance of inspection, and reporting for all activities affecting quality. These inspections are mandatory for Q-List items and are optional for BOP items." The review of Job Orders discussed in the Details, Section 8, of this report indicates that form QC-2's are not in general prepared for Q-Listed items. This is considered an item of noncompliance.

2. In the area of preventative maintenance, the inspector could find no Operational QA Program requirements including inspection. Preventative maintenance is discussed in the Details, Section 11, of this report. This is considered an item of noncompliance.
3. The inspector reviewed the Inservice Inspection Program to determine if inspections by the licensee were performed during preservice inspection. The inspector found that the Contractor's Manual was, "Reviewed and Accredited by AP&L QA" on September 7, 1973. The licensee also developed a checklist for inspection (Appendix IV to QCP 1004.08) of the automatic ultrasonic (UT) examination of the reactor vessel and associated equipment which was implemented during this phase of inspection (4/10-17/75). The licensee could produce no documented inspection of Preservice Inspection, with exception of that performed for the automatic inspection by UT. This is considered an item of noncompliance.

During review of the licensee's procedure 1304.58, Revision 0, dated March 22, 1975, the inspector identified that it was not apparent that the licensee had complied with the procedure requirements for Plant Safety Review Committee review of revisions to 1304.58, (Section 5.2 states in part, "The Plant Safety Review Committee reviews the procedure and any revisions thereto. . .") and review of the final preservice report (Section 5.6 states in part, "The final report is submitted to the Plant Safety Committee for review."). The Preoperational Inspection Manual for Arkansas Nuclear One, Unit 1, attached to 1304.58 was dated August 12, 1974, inspection procedure BLI-21-Dye Penetrant Inspection, and Acceptance Standards for Base Materials, Section 2.0 - General ASME Section XI Requirements, dated April 19, 1974, and Section 3.0 - Listing of Welds, dated May 23, 1974; of above identified manual were found to have been incorporated into 1304.58 subsequent to its March 22, 1975 issue date, with no apparent review by the PSC. The licensee could produce no record of review by the PSC of the "Base line Inspection Report Arkansas Power and Light Company, Arkansas Nuclear One, Unit #1" dated August 12, 1974. This is identified as an item of noncompliance.

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The licensee has not issued an approved plan or schedule for the present three year inservice period. The development of an approved plan and schedule is considered an unresolved item and will be subject to further inspection. The licensee stated that an approved plan and schedule would be developed by the latter part of 1976. The inservice inspection is to be performed after an approved plan and schedule is issued.

4. At the exit meeting, the licensee stated that the wording "subject to inspection" (as specified in Section 10.1.3 of the AP&L Quality Assurance Manual for Operations) implied should or may with regard to the quality related activities identified in Section 10.1.3.