Arkansas Power and Light Company
Arkansas Nuclear One, Unit No. 2
Docket No. 50-368
License No. NPF-6

NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of September 22 - October 21, 1980, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. Technical Specification 3.5.2 requires, when in Modes 1, 2, and 3, that two independent Emergency Core Cooling Systems (ECCS) subsystems shall be OPERABLE with each subsystem including one operable high pressure safety injection (HPSI) pump. Technical Specification 1.6 defines OPERABLE with the following statement:

   > "A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s)."

   Contrary to the above, on October 15, 1980, only the "A" HPSI pump was operable with the unit operating in Mode 1. The "B" HPSI pump was out of service for maintenance and the operability of the "C" HPSI pump was degraded due to a removed access panel from 2VUC 11B, one of the air cooling units for the "C" HPSI pump room. With the access panel removed, air flow would bypass the unit's service water cooling coils and the ability of the cooling unit to perform its design function following a Design Basis Accident becomes questionable.

   This is a Severity Level IV Violation. (Supplement I.D.3).

2. Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented, and maintained covering . . . a. The applicable procedures recommended in Appendix "A" Regulatory Guide 1.33."

   A. Operating Procedure 2102.01, Attachment E, "Category E Valve Position Verification," has been established in accordance with this Technical Specification.

      Attachment E of Operating Procedure 2102.01 requires that manual valve 2SW-17C be locked open. This valve is in the service water return line from the seal and bearing coolers for the "C" high pressure safety injection pump.

Contrary to the above, on October 16, 1980, the NRC inspector found that valve 2SW-17C was open as required, but was not locked.

B. Operating Procedure 2102.02, "Plant Startup," has been established in accordance with this Technical Specification.

Step 13.9 in procedure 2102.02 requires, in part, that valve 2CV-0706 (the Startup and Blowdown Demineralizer supply to the Emergency Feedwater Pumps) be shut. In addition, a plant operator is required to initial the procedural step indicating its completion.

Contrary to the above, on October 15, 1980, valve 2CV-0706 remained open for approximately 45 minutes after step 13.9 of procedure 2102.02 had been initialed complete. During this 45 minute period, several other procedural steps had subsequently been completed as power escalation continued.

This is a Severity Level V Violation. (Supplement I.E.)

3. Table 4.4.4 of Technical Specification 3.4.8 states, in part, that an "Isotopic Analysis for Iodine including I-131, I-133, and I-135" be taken " . . . between 2 and 6 hours following a THERMAL POWER change exceeding 15 percent of the RATED THERMAL POWER within a one hour period."

Contrary to the above, on August 23, 1980, the required isotopic analysis for Iodine was not made within 2 to 6 hours after thermal power changes exceeding 15 percent of the rated thermal power within a one hour period. Specifically, on August 23, 1980, betwen 0000 (midnight) and 0100 (1:00 AM-CDT) hours power was increased by 18 percent, between 0100 (1:00 AM) and 0200 (2:00 AM) hours power was increased by 18 percent, and between 0200 (2:00 AM) and 0300 (3:00 AM) hours power was increased by 24 percent; however, the required isotopic analysis for iodine was not made until 1050 (10:50 AM) hours.

This is a Severity Level V Violation. (Supplement I.E.)

4. Criterion V of 10 CFR 50, Appendix B, states that activities affecting quality shall be prescribed by documented instructions and shall be accomplished in accordance with these instructions.

The licensee has adopted a Quality Assurance Program to meet the requirements of 10 CFR 50, Appendix B, which includes a Quality Assurance Manual.

Section 5.5.2 of the Arkansas Power and Light Company Quality Assurance Manual - Operations (Rev. 4) states, "Applicable instructions, procedures and drawings shall be reviewed, and revised as necessary, following any modifications to the plant."

Contrary to the above, the applicable procedures and drawings were not revised following the performance of Design Change Package 79-2036, performed under BWR 2-9095-79-9. This design change was completed in November 1979. It added a two-inch manual valve in the "C" high pressure safety injection pump recirculation line.

This is a Severity Level V Violation. (Supplement I.E.)

Pursuant to the provisions of 10 CFR 2.201, Arkansas Power and Light Company is hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Dated 11/18/80

for D M Thomas

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