

APPENDIX A

NOTICE OF VIOLATION

Arkansas Power and Light Company
Arkansas Nuclear One

Docket Nos: 50-313; 50-368
License Nos: DPR-51; NPF-6

Based on the results of the NRC inspection conducted during the period March 2-13, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

A. Failure to Review Emergency Procedures

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

Licensee Procedure 1023.08 requires that licensed operators shall review the abnormal and emergency operating procedures not less than twice each year.

Contrary to the above, for Unit 1, one licensed operator had not completed a review of abnormal and emergency operating procedures in 16 months; another operator had not completed the review in 28 months; and two other operators had not completed the review in 33 months. For Unit 2, one operator had not reviewed abnormal and emergency operating procedures in 13 months, and another operator had not completed the review in 15 months.

This is a Severity Level V violation (Supplement I.E.). (313/8106-01; 368/8105-01)

B. Failure to Perform Surveillance Testing

For Unit 1, Licensee Technical Specification 4.10.2 covering surveillance of the Control Room Emergency Air Conditioning and Isolation System states:

"At intervals not to exceed 18 months, automatic initiation of the Control Room Emergency Air Conditioning and Isolation System shall be demonstrated to meet the requirements of Specification 3.9."

Subsection 3.9.1.f of Specification 3.9 states:

"The dampers shall isolate the Control Room within 10 seconds after receipt of a high radiation signal."

Contrary to the above, Licensee Procedure 1104.34, Revision 2, governing the conduct of this test does not specify or document that the dampers isolate the control room within 10 seconds. The procedure does document that air is available to operate the dampers to isolate the Control Room, and that the dampers are closed, but not the timing of closure within 10 seconds.

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This is a Severity Level V violation (Supplement I.E.). (313/8106-02)

C. Failure to Follow Procedures

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

1. For Unit 1, Licensee Procedure 1004.12A states that, "all surveillance calibration, checks, inspections, tests required by Section 4 of the Technical Specifications are specified on the Master Test Control List" (Attachment A to Procedure 1004.12).

Contrary to the above, certain surveillances required by Section 4 of the Technical Specifications are not specified on the Master Test Control List, but are specified on the Unit 1 Reactor Plant Tests and Frequency List.

2. Licensee Procedure 1000.06, Revision 2, "Procedure Review, Approval and Revision Control," requires the independent reviewer for safety-related procedures to complete Form 1013.02M, "Deletion to Station Procedures," if the procedure reviewed supersedes any other procedure.

Contrary to the above, the licensee issued Procedure 1305.06, Revision 0, "Integrated Engineered Safety System Test," for Unit 1 without completion and issuance of Form 1013.02M for superseded Procedure 1304.08, Revision 3.

3. For Unit 1, Licensee Procedure 1004.12A, Revision 6, Change 2, in Attachment B, limits the surveillance test periodicity for calibration of the hydrogen concentration instrument to an "interval not to exceed 18 months."

Contrary to the above, at the time of the inspection these instruments had not been calibrated since April 19, 1979, an interval exceeding 18 months.

This is a Severity Level V violation (Supplement I.E.). (313/8106-03)

D. Failure to Perform Surveillance Testing Within Prescribed Frequency

For Unit 1, Technical Specification 4.11, "Penetration Room Ventilation System Surveillance," subparagraphs 4.11.1 and 4.11.4a state:

"4.11.1 At intervals not to exceed 18 months, the pressure drop across the combined HEPA filters and charcoal adsorber banks shall be demonstrated to be less than 6 inches of water at system design flow rate (\pm 10%)."

"4.11.4a The tests and sample analysis of Specification 3.13.1a, b, & c. shall be performed at intervals not to exceed 18 months or after every 720 hours of system operation and following significant painting, fire or chemical release in any ventilation zone communicating with the system."

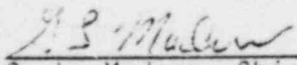
Contrary to the above, the licensee had these tests performed on or about August 31, 1977, April 24, 1979 and January 19, 1981; the resulting intervals between tests exceeds the requirement of "not to exceed 18 months."

This is a Severity Level IV violation (Supplement I.D.2.). (313/8106-04)

Pursuant to the provisions of 10 CFR Part 2.201, Arkansas Power and Light Company is hereby required to submit to this office within 25 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 4/24/81



G. L. Madsen, Chief
Reactor Projects Branch