APPENDIX A

NOTICE OF VIOLATION

Arkansas Power & Light Company
Arkansas Nuclear One, Units 1 and 2

Dockets: 50-313
50-368
Operating Licenses: DPR-51
NPF-6

During an NRC special team inspection conducted during the periods May 15-19 and June 13-16, 1989, of your activities associated with the documentation and submittal of licensee event reports (LERs), two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989) (Enforcement Policy), the violations are listed below:

A. Inadequate Procedures

Unit 1 and Unit 2 Technical Specification 6.8.1.a requires, in part, that written procedures shall be established, implemented, and maintained as recommended in Appendix A of Regulatory Guide 1.33, November 1972 and February 1978, respectively.

Contrary to the above, below are three examples of where the licensee failed to adequately maintain procedures:

1. Unit 1 Operating Procedure 1203.15, "Reactivity Balance Calculations," was revised in August 1976 such that the procedure did not consider the control rod of greatest worth being withdrawn from the core when calculating required shutdown boron concentrations for reactor coolant system temperatures below 275°F. As a result, shutdown margins were less conservative than assumed in the Safety Analysis Report. This condition was not corrected until February 1989.

2. Unit 2 Operating Procedure 2102.02, "Plant Startup," was revised in 1984 such that the containment sump isolation valves for the high pressure safety injection (HPSI) pumps would be restored to operable status after entry into Mode 4. Unit 2 Technical Specification 3.5.3 requires that the HPSI pumps with flow paths capable of taking suction from the refueling water tank on a safety injection actuation signal automatically transferring to the containment sump on a recirculation actuation signal be operable throughout Mode 4. This condition was not corrected until March 1989.

3. Unit 2 System Operating Procedure 2104.01, "Safety Injection Tank Operations," was found by the licensee to allow cross-connecting of all four safety injection tanks (SITs) via the nonseismic piping of the nitrogen addition system. As a result, a failure of the nonseismic nitrogen addition system piping while the SITs were cross-connected could have resulted in the depressurization and

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inoperability of more than one SIT. If this were to occur, this event or condition alone could have prevented the fulfillment of the safety function of the safety injection system. This procedural inadequacy was found and corrected by the licensee in 1985 but was not reported to the NRC until June 6, 1989.

This is a Severity Level IV violation. (Supplement I) (313;368/8922-01)

B. Inoperable High Pressure Injection Pump

Unit 1 Technical Specification 3.3.2.(A) requires that two out of three high pressure injection (HPI) pumps shall be maintained operable, powered from independent essential buses, to provide redundant and independent flow paths when the reactor coolant system is above 350°F and irradiated fuel is in the core.

Contrary to the above, LER 50-313/88-013 (Supplement 1) documented a condition that existed sometime during the period of December 1984 through September 1988 in which one HPI pump (P36B) may have been inoperable under certain system alignment configurations because of a wiring error that affected the automatic starting circuitry for P36B. As a result, the requirement to maintain two out of three operable HPI pumps may not have been met when required during this period.

This is a Severity Level IV violation. (Supplement I) (313/8922-02)

Pursuant to the provisions of 10 CFR 2.201, Arkansas Power & Light Company is hereby required to submit to this office, within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 4th day of January 1990