

APPENDIX A

NOTICE OF VIOLATION

Arkansas Power and Light  
Little Rock, Arkansas

Docket Nos. 50-313/50-368  
License Nos. DPR-51/NPF-6

As a result of the inspection conducted on October 16-26, 1989, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1989), the following violations were identified:

- A. Title 10, Paragraph 50.55a of the Code of Federal Regulations requires that a plant Inservice Inspection Program be established and performed in accordance with applicable editions of the ASME code. Accordingly, the Arkansas FSAR and Inservice Inspection Program invoke the requirements of the 1980 edition of Section XI of the ASME code with addenda through the winter of 198i for the second 10 year inspection interval. ASME Section XI, IWA-2600 and Appendix III, Supplement 2 of that code require establishment of a reference system that identifies each weld (including vendor welds), location of each weld center line, and designation of regular intervals along the length of the weld.

Contrary to the above, an NRC inspection identified that the Arkansas Unit 1 Inservice Inspection (ISI) Program had no reference marking system and that the welds within the ISI Program were not marked with unique identifiers.

The is a Severity Level IV violation. (Supplement I)

- B. 10 CFR 50, Appendix B, Criterion XVII-Quality Assurance Records, requires that quality assurance records shall be identifiable and retrievable consistent with applicable regulatory requirements. Site Quality Manual Section 17.0, Quality Assurance Records, invokes ANSI N45.2 that requires quality records be indexed, filed and maintained in facilities that provide a suitable environment to minimize deterioration or damage and to prevent loss. Site Design Document Control Procedure 6000.20 reinforces these requirements.

Contrary to the above, an NRC inspection during October 16-26, 1989 disclosed that over seventeen 5 drawer file cabinets containing quality assurance records such as vendor as-built drawings, NDE inspection reports and other historical quality records, were stored improperly in the hall of the Drawing Control Center. These records were not indexed, filed, and maintained in facilities that provide a suitable environment to minimize deterioration or damage and to prevent loss.

This is a Severity Level V violation. (Supplement I)

- C. 10 CFR 50, Appendix B, Criterion VI-Document Control, requires that a system be in place that establishes the control of drawings including changes. These controls should preclude the possibility of use of outdated or inappropriate drawings. Site QA manual Section 6.0 for Document Control reinforces these requirements.

Contrary to the above, an NRC inspection during October 16-26, 1989, identified the following examples of failure to effectively control drawings.

(i) The latest revisions to many plant isometric drawings do not reflect changes as required by design change packages (DCPs). The drawing changes required by the DCPs have not been made nor are the DCPs affecting the drawings listed or issued with the appropriate drawing. A specific example is isometric drawing 2CCB-61-1, Rev. 6 which does not incorporate the drawing revisions required by DCP-89D-20260 and does not list DCP-89D-20260 as affecting the drawing.

(ii) Information on drawings is inadequate in that it does not include information such as unique weld identities for field welds and vendor welds. This information is necessary to positively identify the weld in order to readily retrieve historical records, such as vendor as-built drawings and inspection records. A specific example is ISO 2CCB-70-4, Rev. 6, which did not uniquely identify welds in spool piece S1-2CCB-70-4-2.

(iii) Piping hanger and support drawings do not include changes resulting from previous design change packages. A specific example is drawing 2HCC-290-H32 revision N-2, which does not accurately reflect the actual "as-built" configuration of the supports.

This is a Severity Level V violation. (Supplement I)

Pursuant to the provisions of 10 CFR 2.201, Arkansas Power and Light is hereby required to submit to this office within thirty days of the date of the letter which transmitted 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 be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

Dated at Arlington, Texas,  
this *22nd* day of *January* 1990.