

APPENDIX A
NOTICE OF VIOLATION

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

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

During an NRC inspection conducted November 16 through December 31, 1989, violations of the NRC requirements were identified. The violations involved failure to maintain the environmental qualification of certain plant equipment and failure to comply with approved station procedures. 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. Failure to Prepare Splices in Accordance with a Drawing

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

To meet the requirements of 10 CFR, Appendix B, in preparing tape splices for motor operated valves, the configuration for an electrical connection splice was detailed in AP&L Drawing E-2052, Sheet 37E. This drawing establishes acceptable configurations for environmentally qualified tape splices and requires the use of T-95/35 tape.

Contrary to the requirements of Drawing E-2052, Sheet 37E, the tape splices for Feedwater Containment Isolation Valves CV-2630 and CV-2680 (required to be environmentally qualified) had no Okonite T-95/35 tape installed.

This is a Severity Level IV violation. (Supplement I) (313/8945-01)

B. Failure to Follow Procedural Requirements

10 CFR Part 50, Appendix B, Criteria V states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings"

Licensee Procedure 1025.003, "Conduct of Maintenance," provides requirements for the control of work activities. Specifically, paragraphs 3.8 and 4.3A require that lifted leads be marked to aid in retermination and that independent verification of the retermination be performed. In addition, paragraphs 6.27.6 and 6.27.7 provide measures for the control of procedures, including signoffs, when working in a contaminated area.

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Contrary to the above, the licensee failed to comply with procedural requirements during maintenance activities in the three examples discussed below:

1. During calibration of the Unit 2 feedwater control system, various electrical leads were lifted. Subsequent inspections of a feedwater control cabinet identified a loose electrical lead. A review of the work history indicates that no independent verifications of electrical lead reterminations were performed.
2. On November 27, 1989, while testing Unit 1 Low Pressure Injection Flow Transmitter PDT-1402, the output leads from the transmitter were lifted then later reterminated. Subsequent testing revealed that the output leads were reversed when reconnected. When the output leads were reterminated, an independent verification was not performed.
3. On November 27, 1989, while observing the reassembly of the motor operator for Unit 1 High Pressure Injection Valve CV-1220, the inspector noted that none of the removed or restored signoffs on the "Lifted Lead Data Sheet" had been made. The licensee's craftsman stated that all of the signoffs would be made after the work was completed and the worker had exited the contaminated area. This method of completing signoffs is contrary to the requirements of Administrative Procedure 1025.003.

The above examples constitute a Severity Level IV violation. (Supplement I)
(313/8945-02; 368/8945-02)

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 *1st* day of *February* 1990