

APPENDIX A
NOTICE OF VIOLATION

Arkansas Power & Light Company
Arkansas Nuclear One (ANO)

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

During an NRC inspection conducted on January 29 through February 2, 1990, violations of NRC requirements were identified. The violations involved failures to: verify a transferee's license, follow procedures, properly source check radiological instrumentation, and unauthorized disposal of radioactive material. 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:

1. Technical Specification 5.1.8.a for Units 1 and 2 requires that written procedures shall be established, implemented, and maintained covering activities recommended in Appendix A of Regulatory Guide 1.33. Section 7.3 addresses contamination control.

Paragraph 6.4.2 of the licensee's Procedure 1622.010 requires the initiation of decontamination procedures for contamination of individuals utilizing the guidelines provided in Appendix II, and that any contaminated hair that cannot be decontaminated must be removed.

Contrary to the above, on January 31, 1990, the inspectors determined that hair of an individual which was contaminated with 30 nanocuries of cobalt 58 on December 20, 1989, could not be decontaminated and the hair was not removed.

This is a Severity Level IV violation. (Supplement VI) (313/9004-01; 368/9004-01)

2. Technical Specification 4.3.3.9 for Unit 2 states that each radioactive gaseous effluent monitoring instrumentation channel shall be demonstrated operable by performance of the channel check, source check, channel calibration, and channel functional test at the frequencies shown in Table 4.3-12. Table 4.3-12 requires the gas activity monitors in the Unit 2 spent fuel area ventilation system, auxiliary building area ventilation system, and auxiliary building extension ventilation system to be source checked monthly.

Contrary to the above, the inspectors determined on January 30, 1990, that the General Electric gas activity radiation monitors in the Unit 2 spent fuel area ventilation system, auxiliary building area ventilation system, and auxiliary building extension ventilation system had not been monthly source checked in March, April, May, July, August, October, November, and December 1989.

This is a Severity Level IV violation. (Supplement I) (368/9004-02)

3. 10 CFR Part 30.41(c) requires that before transferring byproduct material to a specific licensee, the licensee transferring the material shall verify that the transferee's license authorizes receipt of this material. Paragraph (d) describes acceptable methods to verify the requirements in paragraph (c).

Contrary to the above, on January 31, 1990, the inspectors identified that the Arkansas Power & Light Company (transferor) transferred byproduct material on September 9, 1989, to a specific licensee (transferee) without verifying that the transferee was authorized to receive the material.

This is a Severity Level IV violation. (Supplement VI) (313/9004-03; 368/9004-03)

4. 10 CFR Part 20.301 requires that no licensee shall dispose of licensed material except by transfer to an authorized recipient.

Contrary to the above:

- a. On October 11, 1988, the licensee identified that a 6000 gallon liquid waste from the ANO sanitary sewage treatment system containing less than $1.0E-6$ $\mu\text{Ci/cc}$ of cesium 137 was on October 7, 1988, disposed in the Russellville Municipal Sewage Treatment System without authorization to dispose of such material.
- b. On October 22, 1989, the licensee identified the presence of radioactive material in dirt and ash at levels of about 0.08 mR/hr in their landfill located in an unrestricted area. The licensee did not have authorization to dispose of radioactive material in this manner.

This is a Severity Level IV violation (Supplement IV) (313/9004-04; 368/9004-04)

The licensee's corrective action for the above violation was reviewed on January 30 and 31, 1990, and determined to be adequate to correct the violation and prevent a recurrence. Accordingly, no written response is required for this violation.

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 Violations 1, 2, and 3: (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 3rd day of May 1990