

## NOTICE OF VIOLATION

Entergy Operations, Inc.  
Arkansas Nuclear One, Units 1 and 2

Docket Nos. 50-316; 50-368  
License Nos. DPR-51; NPF-6  
EA 94-033

During an NRC inspection conducted February 2-9, 1994, 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, the violations are listed below:

- A. Technical Specification 3.4.1 states, in part, that the reactor shall not be heated above 280 degrees F unless both EFW pumps and their flow paths are operable. Technical Specification 3.4.5.1 states, in part, that with one EFW flow path inoperable, the unit shall be brought to hot shutdown within 36 hours.

Contrary to the above, at approximately 12 a.m. on January 28, 1994, one EFW flow path became inoperable due to a malfunctioning steam generator level transmitter (which would have affected automatic flow control in one flowpath) and the unit was not brought to hot shutdown within 36 hours. The unit was brought to hot shutdown at approximately 1:55 p.m. on February 1, 1994, approximately 74 hours after one EFW flowpath became inoperable. (01013)

- B. Technical Specification 6.8.1.a requires, in part, that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972.

Regulatory Guide 1.33, Appendix A, Revision 2, November 1972, lists typical safety-related activities that should be covered by written procedures, including: (1) administrative procedures governing the authorities and responsibilities for safe operation and shutdown, and (2) administrative procedures governing log entries and record retention.

ANO Procedure 1015.003A, Revision 31, "Unit One Operation Logs," Section 6.5.4 requires, in part, that operators perform the following actions when an Operability Difference ("Op. Diff.") value is exceeded: declare the affected instrument channel or indicator inoperable; initiate a condition report; and implement any actions required by Technical Specification Limiting Conditions for Operation.

Procedure 1015.003A, Section 4.4, defines operability difference values as variations between Technical Specification or other NRC required instrumentation channels monitoring the same parameter which, if exceeded, will constitute instrument component inoperability.

Procedure 1015.003A, Form 1015.003A-7, "CBO Reactor Logsheet," specifies an operability difference of 8 inches for instrumentation channels monitoring Steam Generator Low Range Level and, in Footnote 2, requires that if the operability difference limits are exceeded, the SS/CRS

(shift superintendent/control room supervisor) be immediately notified, a condition report be written, and the affected instrument be declared inoperable.

Section 6.5.2 of ANO Procedure 1015.001, Revision 46, "Conduct of Operation," requires, in part, that the Control Board Operator (Reactor) monitor parameters associated with plant operations, recording those which are specified on log sheets, and notify the SS or CRS of unusual indications or abnormal trends.

Contrary to the above, from January 28, 1994, until January 31, 1994, the indication from Steam Generator Low Range Level Transmitter LT-2622 varied from the other NRC required instrument channel indications monitoring the same parameter by more than 8 inches, a value in excess of the specified operability difference, and licensed operators did not: (1) immediately notify the SS/CRS that the operability limit was exceeded; (2) declare Low Level Transmitter LT-2622 inoperable; (3) initiate a condition report; and (4) implement actions required by the Technical Specifications Limiting Conditions for Operation for an inoperable EFW flow path. (01023)

These violations represent a Severity Level III problem (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Entergy Operations, Inc., is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at Arkansas Nuclear One, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Dated at Arlington, Texas  
this 4th day of April 1994