

## NOTICE OF VIOLATION

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

Docket Nos. 50-313; 50-368  
License Nos. DPR-51; NPF-6  
EA 95-085

During an NRC inspection conducted on March 13-14 and April 17-21, 1995, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," (60 FR 34381, June 30, 1995), the violations are listed below:

A. Unit 1 Technical Specification 6.10 states that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation protection.

1. Procedure 1012.019, Revision 2, "Radiological Work Permits," Section 6.2.6, requires, in part, that "When the ALARA Category is a Cat II or III, then implement a 1012.019K, 'Pre-job ALARA Work Sheet,' and route to the craft for completion."

Contrary to the above, prior to the removal and replacement of the Unit 1 core support assembly (CSA), an as-low-as-reasonably-achievable (ALARA) Category II activity performed on March 9, 1995, the licensee did not route a pre-job ALARA work sheet for Radiation Work Permit (RWP) 1995-1093 to the appropriate craft for completion. (01013)

2. Procedure 1012.019, Revision 2, "Radiological Work Permits," Section 6.2.9.B states that, "When a pre-job briefing is indicated, then specify the following items, as applicable to the conditions in step 6.2.8, in the appropriate RWP task: (A) Default alarming dosimeter set points, (B) Criteria for termination of the entry...."

RWP 1995-1093, developed for the removal and replacement of the Unit 1 CSA, stated that the criteria for termination of an entry were (1) alarming dosimeter dose alarm, (2) individual time based on available dose, and (3) unexpected job difficulties.

Contrary to the above, on March 9, 1995, during the removal and replacement of the Unit 1 CSA, four individuals involved in this task did not terminate the entry (leave the area) despite dosimeters alarming on accumulated dose and unexpected job difficulties (i.e., radiation doses higher than expected were encountered). It was subsequently determined that the termination criteria in RWP 1995-1093 did not establish specifics, including what constitutes termination and how to accomplish it. (01023)

8. Unit 1 Technical Specification 6.8.1 requires, in part, that written procedures shall 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, Section A

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includes administrative procedures for procedural review and approval. Section I includes procedures for performing maintenance that can affect safety-related equipment.

1. Procedure 1000.006, "Procedure Control," requires the originator of a procedure revision to determine if the procedure should be classified as an infrequently performed test or evolution (IPTE) per Procedure 1000.143. Procedure 1000.143, Revision 1, "Control of Infrequently Performed Tests or Evolutions," defines an IPTE as an activity that is infrequently performed and has the potential to significantly degrade nuclear, radiological, or personnel safety and/or equipment/plant reliability. Activities classified as IPTEs require additional controls intended to prevent unanticipated problems from occurring which would result in degradation of any margin of safety.

Contrary to the above, prior to the removal and replacement of the Unit 1 CSA on March 9, 1995, an activity that is infrequently performed and has the potential to significantly degrade radiological safety, this activity was not classified as an IPTE in accordance with the requirements specified in Procedure 1000.143 and additional controls were not established for the installation of the CSA installation. (01033)

2. Procedure 1402.055, Revision 2, "Removal and Replacement of the Core Support Assembly," Step 8.3.8 requires that a complete briefing be held between all personnel involved with the lift of the core support assembly prior to performing the lift.

Contrary to the above, prior to the removal and replacement of the Unit 1 CSA on March 9, 1995, a complete briefing including all personnel involved with the replacement of the CSA was not conducted prior to performing the lift. (01043)

3. Procedure 1402.055, Revision 2, "Removal and Replacement of the Core Support Assembly," Step 8.3.4 requires that the fuel transfer canal be flooded to the normal refueling elevation prior to replacement of the core support assembly. Procedure 1102.015, "Filling and Draining the Fuel Transfer Canal," Revision 15, Step 5.7, states that the fuel transfer canal water level for refueling was between 400.5 feet elevation and 399.0 feet elevation.

- (1) Contrary to the above, on March 9, 1995, the licensee failed to establish the required fuel transfer canal water level prior to moving the core support assembly which resulted in a highly irradiated section of the core support assembly being lifted above the surface of the water and higher than expected dose rates and accumulated doses for personnel involved in the activity. (01053)

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- (2) Contrary to the above, Procedure 1402.055, Revision 2, "Removal and Replacement of the Core Support Assembly," was inadequate in that it did not incorporate radiation dose reduction provisions to prohibit raising the hold-down bolt area of the CSA above an established normal fuel transfer canal water level. (01063)

- C. Unit 1 Technical Specification 6.2.2.1 requires that administrative controls shall be established to limit the amount of overtime worked by plant staff performing safety-related functions.

Station Directive 2.201, "Overtime," requires that an individual should not be permitted to work more than 16 hours straight, excluding shift turnover time. Requests to deviate from this limitation were required to be approved by the appropriate major department head.

Contrary to the above, on March 9, 1995, personnel directly involved in the replacement of the core support assembly worked between 19 and 20 hours straight without the approval of the Unit 1 Plant Manager, the appropriate major department head. (01073)

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, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each alleged 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. The response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. 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.

Because the response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personnel privacy, proprietary, or safeguards information so that it can be placed in the PDR without

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redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Arlington, Texas  
this 17th day of July 1995