

APPENDIX A

NOTICE OF VIOLATION

Entergy Operations, Inc.
Arkansas Nuclear One, Unit 1

Docket: 50-313
License: DPR-1

During an NRC inspection conducted during the period March 29 through May 9, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification (TS) 6.8.1 requires, in part, that written procedures shall be established, implemented, and maintained covering surveillance and test activities of safety-related equipment. Procedure 1000.006, "Procedure Control," states, in part, that "Unless specified otherwise, the specific sequence of a procedure is required or mandatory from a safety viewpoint and shall be followed step-by-step." Procedure 1015.001, "Conduct of Operation," states, in part, "Plant procedures shall be adhered to by the user except as licensed supervisory personnel determine that due to extenuating circumstances, adherence to the procedure will create an undue hazard to personnel, equipment, or health and safety of the public." Procedure 1000.009, "Surveillance Test Program Control," states, in part, "The test shall be performed in accordance with the applicable Surveillance Test Procedure and job order if applicable."

TS 6.8.3 further requires, in part, that changes to procedures may be made prior to obtaining the review and approval required in TS 6.8.2 provided the change is documented, reviewed by the PSC, and approved by the General Manager, Plant Operations, Plant Manager, ANO-1, or responsible major department head within 14 days of implementation.

Contrary to the above, on April 10 the inspector observed Step 7.20 from Procedure 1305.006, Revision 12, "Integrated ES System Test," being performed prior to Step 7.19. During followup interviews, the licensee determined that Section 6.1.12 from Procedure 1015.10, Revision 5, "Operations Procedure Format & Content," which contains guidelines for writing operating procedures, had been inappropriately interpreted to give the Shift Supervisor or the Control Room Supervisor (licensed personnel) the discretionary authority on a routine basis to perform steps in an alternate sequence or in parallel when in their judgment an equivalent outcome would result and the change was of no safety consequence. These changes were not being documented, reviewed, and approved as required. Procedure 1015.10 did describe this discretion but was intended to mean that steps allowing discretion by licensed operators could be written into specific instructions if appropriate.

This example and the associated failure to correctly interpret Procedure 1015.10 consistent with the current Technical Specifications constitutes one Severity Level IV violation. (Supplement I) (313-92008-01)

Pursuant to the provisions of 10 CFR Part 2.201, Entergy Operations, Inc., is hereby required to submit to this office, within 30 days of the date of 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) 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 *8th* day of *June* 1992