

APPENDIX A  
NOTICE OF VIOLATION

Arkansas Power and Light Company  
Arkansas Nuclear One, Unit 1

Docket: 50-313/85-01  
License: DPR-51

Based on the results of an NRC inspection conducted during the period of January 1-31, 1985, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following violations were identified:

A. Failure to Provide Instructions for a Quality-Related Design Change Activity (Unit 1)

10 CFR Part 50, Appendix B, Criterion V and Section 5.1.1 of the AP&L Quality Assurance Manual for Operations (APL-TOP-1A) require that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings.

Contrary to the above, the licensee's design change control procedure did not provide adequate control for the temporary removal of interferences during plant modification and/or maintenance activities.

This is a Severity Level IV Violation. (Supplement I.D) (313/8501-01)

B. Failure to Follow Procedural Requirements for Design Change Control (Unit 1)

10 CFR Part 50, Appendix B, Criterion V and Section 5.1.1 of the AP&L Quality Assurance for Operations (APL-TOP-1A) require that 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 procedures, instructions, and drawings.

Plant Engineering Administrative Procedure 1032.02, "Installation Technical Support" has been established in accordance with Criterion V.

Section 6.3.7 of Procedure 1032.02 requires that the responsible engineer ensure that piping and instrumentation drawings (P&IDs) affected by an outage design change package (DCP) be updated prior to returning the system/component to service after the modification has been completed.

Contrary to the above, system modifications were made to the Unit 1 emergency feedwater system in accordance with DCP 80-1083A; however, two P&IDs which were affected (M-204, Sheet 3 and M-206, Sheet 1) were not updated prior to returning the system to service.

This is a Severity Level IV Violation. (Supplement I.D) (313/8501-02)

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C. Failure to Follow Procedure for Design Change Completion and System Turnover (Unit 1)

Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented, and maintained covering the ... applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November, 1972 . . . ."

Appendix A of Regulatory Guide 1.33 includes, "General Procedures for the control of maintenance, repair, replacement, and modification work . . . ."

Overall Plant Administrative Procedure 1000.24, "Control of Maintenance," has been established in accordance with this requirement. Sections 7.7 and 7.8 of this procedure include the following requirements concerning the completion of Sections 4 and 5 of the job order form:

- 7.7.9 When the job has been completed, including post maintenance checkouts prior to releasing the system to Operations, fill in the date and time and sign the "work completed, system released" blocks.
- 7.8.2 When all testing and/or maintenance of the repaired equipment is completed, the Operations Shift Supervisor or his designated representative, indicates acceptance of the system for operation by signing the "work accepted" block of the job order.

Contrary to the above, on January 17, 1985, and January 30, 1985, the NRC inspectors identified several job orders for design changes or maintenance on systems required for plant heatup which did not have Sections 4 or 5 completed. On January 17, 1985, the first post-refueling reactor criticality was reached, and on January 30, 1985, the unit was being cooled down following power operation. The required systems were operable, but the administrative procedure intended to ensure operability was not followed.

This is a Severity Level V Violation. (Supplement I.E)(313/8501-03)

Pursuant to the provisions of 10 CFR Part 2.201, Arkansas Power & Light Company 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:

- (1) the corrective steps which have been taken and the results achieved;
- (2) corrective steps which will be taken to avoid further violations; and
- (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Date: FEB 26 1985