

APPENDIX A  
NOTICE OF VIOLATION

Entergy Operations, Inc.

Docket Nos.: 50-313

50-368

Arkansas Nuclear One, Units 1 & 2

License Nos.: DPR-51

NPF-6

During an NRC inspection conducted during the period August 2 through September 12, 1992, two 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 (1992), the violations are listed below:

1. Criterion II of 10 CFR Part 2, Appendix B, requires, in part: "The quality assurance program shall provide control over activities affecting the quality of identified structures, systems and components consistent with their importance to safety. Activities affecting quality shall be accomplished under suitably controlled conditions."

Contrary to the above, on August 18, blind drilling in a Unit 2 safety-related switchgear panel disabled control power to the breaker for Low Pressure Safety Injection Pump 2P-60A. Modification activities to safety related switchgear were not suitably controlled.

This is a Severity Level IV violation. (Supplement I) (50-368/9211-01)

Although Section 2.201 requires you to submit to this office, within 20 days of your receipt of this Notice, a written statement of explanation, we note that the corrective actions being taken adequately address the concerns identified within Item 1 of the Notice of Violation. Therefore, no response with respect to Item 1 of the Notice is required.

2. Unit 1 Technical Specification 6.8.1.a required, 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." Safety Guide 33, Appendix A, recommended that personnel monitoring and radiation work permits be covered by written procedures. Procedure 1000.031, Revision 15, "Radiation Protection Manual," required that "Radiologically controlled areas at Arkansas Nuclear One are identified with yellow and magenta (purple) ropes, flags, posting signs, tape, etc. which shall not be used for any other purpose. All personnel are required to adhere to these postings."

Similarly, Unit 2 Technical Specification 6.8.1.a required, in part, that "Written procedures shall be established, implemented and maintained covering . . . the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978." Regulatory Guide 1.33, Appendix A, recommended that radiation work permits be covered by written procedures. Procedure 1000.031, Revision 15, "Radiation Protection Manual," required that "individuals are responsible for: . . . adherence to radiological protection requirements . . ."

and ". . . being knowledgeable of and understanding the requirements and contents of the Radiological Work Permit (RWP) under which work will be performed."

Radiation Work Permit 920993, Revision 1, required workers to perform a whole body frisk when exiting a radioactive materials area.

Radiation Work Permit 921438, Revision 1, required workers to wear surgical gloves for electrical penetration work within a radioactive materials area.

Contrary to the above, the following three examples of failure to follow radiation work permit requirements were identified:

- A. On August 26, 1992, an operator and an escorted visitor failed to adhere to a radiological posting for a radioactive materials area, which indicated a radiation work permit and contamination monitoring was required for entry.
- B. On September 4, 1992, the resident inspector observed that two main steam safety valve workers failed to perform whole body frisks when exiting a radioactive materials area as required by Radiological Work Permit 920993, Revision 1.
- C. On September 8, 1992, the resident inspector observed that two Electrical Penetration 2E-22 workers failed to wear surgical gloves when performing work within a radioactive materials area as required by Radiological Work Permit 921438, Revision 1.

These three examples constitute one Severity Level IV violation.  
(Supplement IV) (313/9211-02; 368/9211-03)

Pursuant to the provisions of 10 C.F.R. Part 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, DC 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 of Violation (Notice), within 30 days of the date of the letter transmitting this 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 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.

Dated at Arlington, Texas,  
this *8th* day of *October* 1992