

APPENDIX A
NOTICE OF VIOLATION

Arkansas Power & Light Company (AP&L)
Arkansas Nuclear One, Units 1 and 2

Dockets: 50-313
50-368

Licenses: DPR-51
NPF-6

During an NRC inspection conducted August 15 through September 2, 1988, violations of NRC requirements were identified. The violations involved failure to appropriately revise procedures for control of design changes and modifications after abolishment of an involved organization; failure to obtain relief from the NRC when conformance to inservice inspection requirements is impractical; failure to have appropriate procedures in effect for conduct of receiving inspections; and failure to have records of qualification of an auditor. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below:

A. Failure to Revise Procedures to Reflect a Major Reorganization

Criterion I of Appendix B to 10 CFR Part 50 requires, in part, that the licensee shall establish the authority and duties of persons and organizations performing activities affecting safety-related functions. Criterion II requires, in part, that the organizations participating in the quality assurance program and their designated functions be identified. Criterion V requires that activities affecting quality be documented in instructions, procedures, or drawings and that that these activities shall be accomplished in accordance with these instructions, procedures, or drawings.

The Quality Assurance Manual Operations, Revision 9, implements all of the above requirements.

Contrary to the above, on or about January 4, 1988, the licensee abolished an organization entitled Nuclear Services that had been substantially involved in the design change program without revising the procedures prescribing that organizations functions. As a minimum, the following licensee procedures are involved:

- o Procedure 6000.10, "Design Change Requests," Revision 0, dated April 15, 1987
- o Procedure 6010.001, "DCP Development," Revision 0, dated November 16, 1987
- o Procedure GTEP-201, "Design Change Initiation and Control," Revision 16

- o Procedure 1032.01, "Plant Engineering Action Requests," Revision 9, dated November 16, 1987.

This is a Severity Level IV violation. (Supplement I)(313/8826-01; 368/8826-01)

B. Failure to Obtain Relief From NRC Where the Licensee Has Determined That Conformance With Certain Code Requirements is Impractical.

10 CFR Part 50.55a(a)(g)(iii) requires that, if the licensee has determined that conformance with certain code requirements is impractical for its facility, the licensee shall notify the Commission and submit information to support the determinations.

Contrary to the above, AP&L did not notify the Commission that the Unit 1 reactor vessel head to flange weld could not be volumetrically examined as required by paragraph IWB-2500 of Section XI of the ASME Boiler and Pressure Vessel Code, 1980 Edition and Addenda through Winter 1981. The ultrasonic examination of the above weld performed on November 19, 1986, and reported in Examination 02-001, could not be scanned from at least one direction as required by paragraph T-441.5 of Section V of the ASME Code. Examination 02-001 reported that the percent of examination performed was 50 percent because of obstruction from lifting lugs, superstructure, and flange configuration.

This is a Severity Level IV violation. (Supplement I)(313/8826-02)

C. Failure to Have a Procedure for Performing Quality Assurance (QA)/Quality Control (QC) Receiving Inspection Functions

Criterion V of Appendix B to 10 CFR Part 50 as implemented by the licensee QA Manual Operations, Revision 9, requires that activities affecting quality shall be prescribed by instructions, procedures, or drawings appropriate to the circumstances and that these activities be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, the licensee deleted Procedure QCO-5, "Purchase Requisition Review, Receipt Inspection, and Independent Material Test," on about July 21, 1988, with the intention of replacing it with Procedures QAO-2, "QA Review for Procedures and Documents," and QAO-11, "Receipt Inspection and Independent Testing." As of the conclusion of the inspection on September 2, 1988, a date for issue of Procedure QAO-11, had not been established.

This is a Severity Level V violation. (Supplement I)(313/8826-03; 368/8826-03)

D. Failure to Maintain Records of Auditor Qualification

Criterion XVII of Appendix B to 10 CFR Part 50 requires that records shall be maintained that include the qualifications of personnel performing audits and similar quality related activities.

Licensee Procedure NQA-2 implements the above by requiring that records be established and maintained which document the education and past experience of all QA personnel.

Contrary to the above, records were not available with respect to the education or experience of an auditor who performed, in part, Audit QAP-18H-88 during the period of January 21 through April 22, 1988.

This is a Severity Level V violation. (Supplement I)(313/8826-04; 368/8826-04)

Pursuant to the provisions of 10 CFR 2.201, Arkansas Power & Light Company is hereby required to submit a written statement or explanation to this Office within 30 days of the date of the letter transmitting this Notice. This reply, should include for each violation: (1) the reason for the violations if admitted, (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. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this *27th* day of *September* 1988