

APPENDIX A

NOTICE OF VIOLATION

Arkansas Power & Light Company

Dockets: 50-313

50-368

Arkansas Nuclear One, Units 1 & 2

Licenses: DPR-51

NPF-6

During an NRC inspection conducted during the period August 1 through September 15, 1988, two violations of the NRC requirements were identified. The violations involved failure to follow procedures concerning control of components and failure to properly calibrate a torque wrench attachment used in the repair of a plant component. 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. Unit 1 Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained for the activities recommended in Appendix A of Regulatory Guide 1.33, November 1972. This appendix includes a recommendation for procedures for equipment control (locking and tagging).

Contrary to the above, the licensee failed to follow procedures for equipment control in the two cases discussed below.

1. Section 6.6.2 of Procedure 1000.27, "Hold and Caution Card Control," requires: "Verify the component by label as being the component which is specified on the Hold Card." This requirement was not met on August 29, 1988, when Valve DH-3A was inadvertently closed while tagging out a portion of the decay heat removal system in order to repair a relief valve. Valve DH-3A was not opened when the system was aligned following repairs on August 30, 1988, adversely affecting the operability of Train A of the decay heat removal system.
2. Step 6.2 of Procedure 1304.53, "ESAS Analog Channel No. 2 Calibration," requires the power supply breaker for Valve CV-1410 to be open with a hold card attached. The licensee failed to comply with this step on September 5, 1988, during performance of Procedure 1304.53. While conducting Step 7.7, Valve CV-1410 inadvertently closed resulting in isolation of the decay heat removal system.

This is a Severity Level IV violation. (Supplement 1) (313/8825-01)

- B. Unit 2 Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, Item 8, requires procedures for control of measuring and test equipment and for surveillance tests, procedures, and

calibration. Plant Procedure 1405.011, "Bulging and Torquing Guidelines," has been established in accordance with this Technical Specification requirement.

Paragraph 8.4.2.A.2 of Plant Procedure 1405.011 requires the indicated torque be adjusted in accordance with Attachment 4 when torque multipliers or adapters that extend the point of applied torque are used. Also, Paragraph 8.4.4.C requires the torque wrench to be calibrated while attached to any adapters or extenders that will be used during torquing.

Contrary to the above on August 1, 1988, the NRC inspector observed the use of a torque adapter when torquing two cap fasteners on check valve 2CVC-41B without the indicated torque being adjusted. The torque wrench had not been calibrated while attached to the adapter.

This is a Severity Level IV violation. (Supplement I) (368/8825-01)

Pursuant to the provisions of 10 CFR 2.201, Arkansas Power & Light Company is hereby required to submit to this office within 30 days of the date of the letter transmitting 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) the 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 *14th* day of *October* 1988.