



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76011

APR 24 1989

Docket Nos. 50-313 and 50-368  
License Nos. DPR-51 and NPF-6  
EA 88-192

Arkansas Power & Light Company (AP&L)  
ATTN: Mr. Gene Campbell  
Vice President, Nuclear  
Operations  
Post Office Box 551  
Little Rock, Arkansas 72203

Gentlemen:

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY (NRC  
INSPECTION REPORTS 50-313/86-23 and 50-368/86-24)

This refers to the NRC inspection conducted July 14-18, 1986, at Arkansas Nuclear One (ANO) and your corporate offices of activities authorized by NRC License Nos. DPR-51 and NPF-6 for ANO, Units 1 and 2. The inspection was conducted by a special environmental qualification (EQ) inspection team to assess the program implemented at ANO to meet the EQ requirements of 10 CFR 50.49. This inspection included examination of AP&L EQ records to verify that they contained appropriate analysis and documentation to support the EQ of electrical equipment installed in the plant. A copy of the inspection report was sent to you by letter dated December 11, 1986. The results of the inspection were discussed on August 15, 1988, during an enforcement conference held in the Region IV office between you and other members of your staff with Messrs. J. L. Milhoan and A. B. Beach and the NRC Region IV staff. Additionally, your submittal of January 27, 1989 restating the AP&L position relating to the outstanding issues from the enforcement conference has been reviewed and considered.

The violation in the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Notice) involved the failure to ensure by November 30, 1985, either by adequate testing or analysis, that the Limitorque SMB, SB, and SBD series valve motor operators were qualified with respect to the following

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components: (1) interfacing Scotch 23/33 tape splices; (2) interfacing terminal blocks; and (3) motor housing T-drains. The failure to ensure these motor operators were qualified in accordance with the requirements of 10 CFR 50.49 indicates to NRC that you failed to pay adequate attention to ensuring that equipment important to safety will perform its intended function in harsh environments.

The NRC analysis of these issues demonstrates that AP&L clearly should have known, prior to the November 30, 1985 deadline for completing your EQ program, that the EQ requirements of 10 CFR 50.49 were not met. As-built inspection and documentation review of the equipment should have led you to conclude that the installed equipment was not representative of that which was tested, and no documentation to address the differences was available. An "as-built" inspection, as recommended by Section 5.2.6 of the "Guidelines for Evaluating Environmental Qualification of Class 1E Electrical Equipment in Operating Reactors," November 1979 (DOR Guidelines), could have disclosed that the specified Limitorque valve motor operators were not representative of those that were qualified by testing. Further, some of the deficiencies with Limitorque motor operators were discussed in NRC Information Notice 83-72 as well as other NRC generic correspondence issued prior to November 30, 1985.

Also of concern to the NRC is AP&L's failure to take prompt steps to address NRC Information Notice 86-03 which identified additional environmental qualification deficiencies associated with Limitorque valve motor operator wiring. At the time of the team inspection in July 1986, none of the valve motor operators in ANO Unit 1, which was operating at the time, had been inspected for these wiring deficiencies, even though you were aware that deficiencies may exist. Further, an adequate Justification for Continued Operation (JCO) was not provided to the NRC until July 1986, and then only as a result of the review by the NRC. It is significant that you operated your facility for over eight months without an adequate justification. Therefore, in NRC's view, AP&L's rationale in early 1986 for delaying the inspection of these valve operators until a fall 1986 refueling outage was not adequately supported.

To emphasize the importance of ensuring the environmental qualification of equipment important to safety, I have been authorized, after consultation with the Commission, and the Deputy Executive Director for Nuclear Materials Safety, Safeguards, and Operations Support to issue the Notice of Violation and Proposed Imposition of Civil Penalty (Enclosure 1) in the amount of Seventy Five Thousand Dollars (\$75,000) for the violation described in the enclosed Notice. In accordance with the "Modified Enforcement Policy Relating to 10 CFR 50.49," contained in Generic Letter 88-07 (Enclosure 2), the violation described in the enclosed Notice has been determined to affect a moderate number of systems and components, and therefore is considered to be an EQ Category B violation. The base value of a civil penalty for an EQ Category B violation is \$150,000.

In determining the civil penalty amount, the NRC considered the four factors set forth in the "Modified Enforcement Policy Relating to 10 CFR 50.49," for escalation and mitigation of the base civil penalty amount. These factors

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consist of: (1) identification and prompt reporting of the EQ deficiencies by the licensee; (2) best efforts to complete EQ within the deadline; (3) corrective actions to result in full compliance; and (4) duration of a violation which is significantly below 100 days.

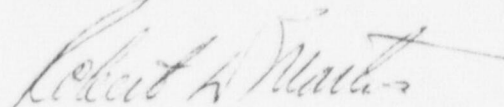
With respect to the first factor, a 50 percent decrease in the base amount appears warranted because AP&L identified most of the deficiencies associated with the Limitorque valve motor operators. With respect to the second factor, a 25 percent decrease in the base amount appears warranted based on AP&L's best efforts to achieve compliance with 10 CFR 50.49 prior to the November 30, 1985 deadline. Although significant problems were discovered with qualification of motor operators, the plant's overall EQ program was found to be good and AP&L demonstrated that significant resources had been devoted to the program. With respect to the third factor, a 25 percent increase is warranted because of AP&L's failure to promptly resolve all Limitorque valve operator environmental qualification problems, including those discussed in Information Notice 86-03. With respect to the fourth factor, no adjustment is warranted because these violations existed more than 100 days.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The response directed by this letter and the enclosed Notice are not subject to the clearance procedure of the Office of Management and Budget as required by the Paperwork Reduction Action of 1980, PL 96-511.

Sincerely,



Robert D. Martin  
Regional Administrator

Enclosures:  
See attached



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Enclosures:

1. Notice of Violation and Proposed  
Imposition of Civil Penalty
2. Generic Letter 88-07

cc w/enclosures:

Arkansas Nuclear One

ATTN: J. M. Levine, Director  
Site Nuclear Operations

Post Office Box 608

Russellville, Arkansas 72801

Arkansas Radiation Control Program Director

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