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U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

REGION VI&F
December 26, 1984
ANPP-31572 WFQ/TJB

IE HQ FILE COPY

Attention: Mr. D. F. Kirsch, Acting Director
Division of Reactor Safety and Projects

Subject: Violation 50-530/84-07-17
Cable Reels
File: 84-019-026; D.4.33.2

Reference: (A) Letter from T. W. Bishop to E. E. Van Brunt, Jr.,
dated June 8, 1984.
(B) Letter from E. E. Van Brunt, Jr. to T. W. Bishop,
dated July 10, 1984.
(C) Letter from D. F. Kirsch to E. E. Van Brunt, Jr.,
dated November 26, 1984.

Dear Sir:

In response to the Reference A Notice of Violation concerning cable reels, APS submitted Reference B. During subsequent inspection by Region V, it was identified that the actions taken by APS in response to the Violation were adequate but the response provided by APS was incomplete.

Therefore, in response to Reference C and as committed to during the NRC exit meeting of October 5, 1984, the following revised response for Enforcement Item No. 50-530/84-07-17 is attached for your review. The revised response is necessary to document the actions taken that confirm the acceptability of safety-related cable identified as part of Enforcement Item 50-530/84-07-17, but not addressed in Reference B. The response previously provided for Item No. 50-530/84-07-17 was technically correct, but did not completely address the identified concern.

Very truly yours,

E. E. Van Brunt

E. E. Van Brunt, Jr.
APS Vice President
Nuclear Production
ANPP Project Director

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EEVB/TJB:sas
Attachment

cc: R. Zimmerman
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IE-01



ANPP-31572

bcc: T. G. Woods, Jr.
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ATTACHMENT A

NOTICE OF VIOLATION

10 CFR 50 Appendix B Criterion V, as addressed in Section 17 of the PSAR, states in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished with these instructions, procedures, or drawings...."

Bechtel Procedure WPP/QCI 5.0, "Nonconforming Materials Parts and Components" Revision 25, Paragraph 9.1 states "Nonconforming items shall be identified by "Hold Tags", marking or other clear means of identification".

Contrary to the above, during an inspection during the week of April 16-20, 1984 of the cable storage and issuing area, it was found that five (5) reels of safety grade cable were stored in a quarantine area for nonconforming material without being identified by a "Hold Tag".

This is a Severity Level V Violation (Supplement II), applicable to Unit 3.

As a clarification, the system in effect at the time of the original inspection provided for an observation of cable prior to moving the cable to the unit by the electrician. Any cable questioned by the electrician was set aside in a "roped off" area for review by the Cable Pull Engineer (CPE). This material would not be considered nonconforming and credit would not be taken for this observation by the electrician. The action is taken to avoid shipping material to an area for use when it may not be acceptable. At the original NRC inspection, cable noted in the Enforcement Item was in this area and was stated to be nonconforming. The confusion resulted when, upon review by the CPE, only one (1) of the reels identified by the NRC was found to be nonconforming. All nonconforming material, i.e. the four (4) reels identified in our previous response, was documented on nonconformances and its control was addressed in Reference A.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED:

At the time of the NRC inspection (April 16-20, 1984), there were eight (8) or more cable reels located in the "roped off" area of the reel yard. The NRC inspection report recorded only the five (5) safety-related cable reels for consideration. Upon notification of the violation, the Unit 3 Cable Pull Engineer (CPE) performed an inspection of all the reels located in the roped off area. The CPE's inspection determined that four (4) reels of cable were found suspect and subsequently reported on NCR's EY-4378 and EY-4379. The four (4) reels consisted of one safety-related cable (EY-4378) and three (3) nonsafety-related (EY-4379) cables. The balance of the reels in the roped off area were determined to be acceptable and available for issue. The safety-related cable reported on NCR EY-4378 (cable code A781 on Reel No. 0004) was one of the five (5) reported by the NRC Inspection Report (A781-0004, A771-0037 (2), A374-0001 and 82E-0018).

Since the original response to Enforcement Item 530/84-07-17 only addressed the reels determined as nonconforming and did not clearly indicate the disposition of the four (4) other safety-related reels, the following additional action was taken. NCR EY-5312 was initiated to report all five (5) reels as being located in the roped off area at the time of the inspection. To disposition the NCR, research was performed to determine cable usage. Documentation of usage is provided by the EE580 control and tracking system. The results showed permanent plant circuits installed utilizing the subject cable to have been inspected and documented as being acceptable to jobsite procedures.

WPP/QCI 254.0, Paragraph 7.4 requires, in part that "the pulling crew shall closely monitor the cable as it is being pulled off the reel, entering the first raceway and at any intermediate rollers/sheaves to assure that the cable is not damaged..." As an additional consideration, Special Construction Inspection Plan (SCIP) 573.0 was initiated to inspect available segments of both earlier and later cable installations from Reel A781-004 for the same defect as mentioned in NCR EY-4378. Engineering concluded from the above that the material was acceptable and dispositioned NCR EY-5312 as "Use-As-Is".

CORRECTIVE STEPS TAKEN TO AVOID FURTHER NON-COMPLIANCE:

The "roped off" area was intended to provide a temporary segregated staging area where reels that were observed with some questionable characteristic could be located pending Engineering evaluation. Reels that are found unacceptable in the reel yard would prevent time delays and double handling if they are not shipped into the plant where the cable pulling crew would inspect, per procedure, and reject the cable. However, to prevent any confusion as to the purpose of the "roped off" area and the responsibilities of personnel involved, a section of the reel yard has been cordoned off and signs placed at prominent locations indicating the area is for quarantined laydown. PCN 69 to WPP/QCI 254.0 was issued to require placement of cable reels in the quarantine area of the reel yard if the cable is found to be questionable. Further, the PCN requires an Engineering evaluation (DFE and/or CFE) of the reels within four (4) working days, to determine if the material is nonconforming.

DATE WHEN FULL COMPLIANCE WAS ACHIEVED:

Full compliance was achieved with the closure of NCR EY-5312 on November 14, 1984. For reference, PCN 69 was issued October 17, 1984, and SCIP 573.0 was completed July 20, 1984.

