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December 28, 1984

ANPP-31597-WFQ/TJB

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

IE HQ FILE COPY

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

Subject: NRC Violation 50-530/84-24-01
Ineffective Corrective Action
File: 84-019-026; D.4.33.2

Reference: (A) Letter from D. F. Kirsch to E. E. Van Brunt, Jr.,
dated November 26, 1984

(B) Letter from E. E. Van Brunt, Jr. to D. F. Kirsch,
ANPP-31598, dated December 28, 1984

This letter refers to the inspection conducted by Messrs. C. Clark and K. Ivey during the period of September 24 - October 5, 1984. Our response to the Notice of Violation identified in Reference A is provided as Attachment A to this letter. This response addresses the technical concerns raised in NRC Violation Item 50-528/84-15-12 and NRC Unresolved Item 50-530/84-07-13, both dealing with thread engagement, as well as the specific concern identified in NRC Violation 50-530/84-24-01 as ineffective corrective action.

Very truly yours,

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

EEVB/ATR/TJB/plk

Attachment

cc: R. P. Zimmerman
P. Narbut
A. C. Gehr

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ATTACHMENT A

NOTICE OF VIOLATION

10 CFR 50 Appendix B Criterion XVI, "Corrective Action" as addressed in Section 17 of the FSAR states in part, "Measures shall be established to assure that conditions adverse to quality...are promptly identified and corrected."

Contrary to the above, conditions adverse to quality were not promptly identified and corrected in that the licensee's final actions on NRC identified thread engagement problems failed to evaluate the additional deficiencies identified as a result of the initial corrective action by the licensee for the NRC findings.

Specifically, during a review on September 25, 1984 of licensee completed actions on enforcement item number 50-528/84-15-12 and unresolved item 50-530/84-07-13 (which deal with inadequate thread engagement) it was determined that, as corrective action, the licensee had performed a limited sample inspection for similar problems. The sample inspection revealed a number of valves with thread engagement problems and loose fasteners. The licensee repaired only the specific valves found in the sample inspection, but significance of the further thread engagement problems found was not evaluated. In particular, the licensee did not determine whether further inspection or corrective action was warranted. Details are provided in this inspection report, paragraph 2. On September 26, 1984, an NRC inspector found a similar valve (3-PSI-EV245) with less than the vendor's recommended stud to bonnet thread engagement.

This is a Severity Level IV violation (supplement II), applicable to Units 2 and 3.

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I. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

ANPP has reviewed the circumstances surrounding the subject Notice of Violation and has obtained and provided the overall engineering position regarding the technical acceptability of the as found valve conditions identified by NRC Violation Item 50-528/84-15-12 (Nut/Stud Engagement) and NRC Unresolved Item 50-530/84-07-13 (Stud to Valve Bonnet Engagement) in the Final Report, Revision 1, for DER 84-53, (Reference B). The DER addresses the scope of the problems, provides a determination that no additional inspection is required, and establishes the technical basis for acceptability of the as found conditions.

Please note that CAR C84-053D was written to ensure controls were instituted by the Architect/Engineer to specify appropriate thread engagement criteria in design documents. Although it was related to the initial NRC items on thread engagement, the CAR was not intended to obtain engineering evaluation of the as found conditions since these evaluations would normally take place as the result of dispositioning NCRs.

II. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER ITEMS OF NONCOMPLIANCE

ANPP Licensing Department Instruction 5I406.01.02, "NRC Inspection and Enforcement Inspection Report Program", will be revised to include an ANPP Engineering review for overall technical adequacy of the documentation packages for NRC Notices of Violations, Deviations, and Open Items. This review, when appropriate, will be designated by the Licensing Department.

III. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The procedural revisions are expected to be completed by January 15, 1985.

