



Arizona Nuclear Power Project

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ANPP-32579-EEVB/WFQ/WEI
May 8, 1985

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

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

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Docket No. STN 50-528 (License No. NPF-34)
Notice of Violation 50-528/85-04/02
Work Control-Unit 1
File: 85-019-026; D.4.33.2

Reference: NRC Inspection Report 50-528/85-04, 50-529/85-06
Letter from D. F. Kirsch (NRC) to E. E. Van Brunt, Jr. (ANPP),
dated April 9, 1985

Dear Sir:

This letter refers to the inspection conducted by Messrs. R. Zimmerman, G. Fiorelli, and C. Bosted on February 1-March 10, 1985. Based on the results of the inspection, one Notice of Violation concerning the implementation of administrative controls governing work activities was issued to ANPP as described in the reference letter. Our response to this Notice of Violation is provided as Attachment A.

Very truly yours,

EE Van Brunt / JSL

E. E. Van Brunt, Jr.
Executive Vice President
Project Director

EEVB/TJB/dlm
Attachment

cc: A. C. Gehr
E. A. Licitra
R. P. Zimmerman

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ATTACHMENT A

NRC NOTICE OF VIOLATION
50-528/85-04/02

Technical Specification 6.8.1 requires in part, that written procedures be established, implemented and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, paragraph 9.e includes general procedures for the control of maintenance in the list of typical safety related activities that should be covered by written procedures.

Palo Verde Nuclear Generating Station (PVNGS) Procedure, 40AC-9ZZ02, Conduct of Shift Operations, Revision 3, dated January 21, 1985, paragraphs 4.3 and 7.4 require that control room operators be attentive to instrumentation and respond to abnormal indications.

PVNGS Procedure 30AC-9ZZ01, Work Control, Revision 7, dated January 4, 1985, paragraph 5.3 requires that a work request be logged at the Maintenance Control Center (MCC) upon receipt from the initiator. Paragraph 5.2.2.3 states that the crew performing the work shall remove the "Equipment Maintenance Required" tag affixed to the defective equipment.

Contrary to the above, the following examples of failure to adhere to procedures for the control of maintenance were identified:

- As of February 27, 1985, work request 072935 submitted to MCC on January 13, 1985 to identify a packing leak on High Pressure Safety Injection Valve 616 was not logged at the MCC, and a work order for repair was not generated.
- As of February 27, 1985, the maintenance crew which completed repairs on the "B" Essential Spray Pond Pump breaker on January 8, 1985, had not removed the "Equipment Maintenance Required" tag affixed to the pump breaker.



1. Corrective Steps Taken and Results Achieved

A walkdown of Unit 1 was initiated by the Operations Shift Supervisor to determine compliance with existing procedural controls for the "Maintenance Required Tags" hung throughout Unit 1. The Shift Supervisor had his personnel record information from tags located in each of the six plant areas as defined in Operating Department Guideline No. 15. The results of this walkdown were then given to the Maintenance Control Center to compare against information in the Station Information Management System (SIMS) and work orders and analyze the significance of the problem.

The results of this walkdown and analysis were divided into four categories:

- a) Tag in place with work request initiated but not in SIMS.
- b) Tag in place with work request cancelled or work completed and tag still hanging.
- c) Tag in place with work requests initiated and entered into SIMS but the work order had not been generated.
- d) Tags identifying a problem entered on SIMS and work orders were generated.

Ninety-six (96) tags were identified and the percentage falling into each of the categories was as follows:

(a)	(b)	(c)	(d)
30%	21%	19%	30%

Category "a" and "b" items were in violation of the procedure. Category "c" and "d" were those items identified which were properly addressed per procedure.

The root cause for category "a" is that the Work Control procedure does not require the work request to be entered into SIMS prior to distribution of the work request to any of the work accomplishment departments. The root cause for category "b" is the lack of understanding, on the part of both Operations and Maintenance personnel, of the importance of the tags, as well as the responsibilities in the use of the tags.



Deficiencies identified in category (a) and (b) will be resolved by updating SIMS or removing the tags as appropriate.

To determine if the problems identified in Unit 1 could exist in Units 2 and 3, ANPP Quality Assurance will conduct a sample audit of hanging "Maintenance Required Tags." Corrective action will be taken to resolve identified problems.

2. Corrective Steps Taken to Avoid Further Items of Non-Compliance

As a result of the walkdown and analysis, the problem with work requests identified but not entered in SIMS will be corrected by having the newly developed "Work Control" group at Unit 1 who will have the specific responsibility to enter all work requests into SIMS before the work request is distributed to any of the work accomplishment departments. The responsibilities of the "Work Control" group will be specifically detailed in the next revision to Procedure 30AC-9ZZ01, "Work Control". The tracking and prioritization capability of SIMS will then ensure that work is not overlooked.

Procedure 30AC-9ZZ01 will be revised to more clearly identify the responsibility for the removal of "Maintenance Required Tags" after the work request is cancelled or after the work is completed. These responsibilities will be emphasized after the release of this procedure revision through the use of the Quality Talk Program or by memo issued from the Plant Manager.

PVNGS Operations walkdowns of Unit 1 will be made by July, 1985 to: 1) ensure if the deficiencies identified in the previous walkdown have been corrected, 2) determine if any other deficiencies exist which were not identified in the previous walkdown, and 3) determine the effectiveness of the actions taken to prevent recurrence of this problem.

3. Dates for Full Compliance

Activities identified in response to this Violation are expected to be completed by August 15, 1985. The schedule for the various commitments identified in Section 2 are as follows:

- a) The initial walkdown is completed.
- b) The Work Control Group will be initiated by May 31, 1985.
- c) Revision 8 to Procedure 30AC-9ZZ01 will be issued by June 7, 1985.

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- d) The Quality Assurance audit will be completed by June 15, 1985.
- e) Review on the procedural changes will be completed within 30 days after issuance of Revision 8 to 30AC-9ZZ01.
- f) The walkdowns will be completed by July 31, 1985.



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