



Arizona Nuclear Power Project

P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

ANPP-38261-EEVB/TDS-96.03

September 16, 1986

Mr. John B. Martin, Regional Administrator
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Docket No. STN 50-528 (License NPF-41)

Notice of Violation: 50-528/86-24-04

File: 86-001-493; 86-032-404

Reference: Letter from D.F. Kirsch, (NRC), to E.E. Van Brunt, Jr., (ANPP), dated August 21, 1986, NRC Inspection Reports 50-528/86-24, 50-529/86-24 and 50-530/86-18.

Dear Mr. Martin:

This letter is provided in response to the inspection conducted by Messrs. R. Zimmerman, C. Bosted, G. Fiorelli, J. Ball, and K. Ivey, of the NRC staff, on July 1 through August 3, 1986. Based on the results of the inspection, one (1) violation of the NRC requirements was identified. The violation is discussed in Appendix A of the referenced letter. The violation and ANPP's response is provided in Attachment A.

Very truly yours,

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

EEVB/TDS/kj

Attachments

REGION V I&E

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NRC

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$\alpha = 0.05$ (one-tailed) \Rightarrow $z_{\alpha} = 1.645$

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cc: O.M. DeMichele	(w/attachment)
J.G. Haynes	(w/attachment)
L.F. Miller	(w/attachment)
R.P. Zimmerman	(w/attachment)
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ATTACHMENT A

NOTICE OF VIOLATION

Arizona Nuclear Power Project
Post Office Box 52034
Phoenix, Arizona 85072-2034

Docket No. 50-528
License No. NPF-41

As a result of the inspection conducted on July 1 - August 3, 1986 and in accordance with NRC Enforcement Policy, 10 CFR Part 2, Appendix C,

the following violation was identified:

10 CFR 50.59(b) requires, in part, that the licensee submit an annual report that includes a brief description and summary of the safety evaluation, for changes made to the facility which constitute changes to the description in the safety analysis report (FSAR).

Contrary to the above, a brief description and summary of the safety evaluations detailing the following changes to the facility as described in the FSAR were not included in the licensee's 1985 annual report, dated May 21, 1986:

- ° Plant Change Package (PCP) #84-01-SA-002-00, completed in April, 1985, changed the signal to close the reactor coolant pump support system isolation valves from a containment isolation actuation signal to a containment spray actuation signal; and,
- ° PCP #85-01-SI-004-00, completed in April, 1985, relocated flow transmitters from the high pressure safety injection (HPSI) pump discharge piping to the HPSI pump suction piping.

I. THE CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Upon identification of the deficiency, a review of the annual 50.59 report for 1985 was initiated to determine if the required information was submitted. Although the review has not been completed, it has been determined that some required information was omitted. A supplemental report will be submitted to correct the annual 10CFR50.59 report which was submitted for 1985.

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

As a result of the identified deficiency, an investigation was conducted, in conjunction with the review discussed in Section I, to determine the root cause of this event. Based upon the results of the investigation, the root cause was determined to be insufficient criteria for establishing what information is required to be included in the annual report. The lack of proceduralized guidance in this area precipitated the following errors:

- ° Modifications to the facility physically completed during 1985, but not having the required FSAR revisions finalized prior to the end of 1985, were not included in the annual report.
- ° Plant changes that modified the facility configuration, as depicted in the piping and instrumentation diagrams (P&ID's) contained in the FSAR, but not requiring changes to the FSAR text description, were excluded from the annual report.

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To address the identified root cause, the following actions will be taken:

- ° Departmental guidelines will be established which provide definitive criteria for the preparation of the annual 10CFR50.59 report.
- ° The review discussed in Section I will be completed and a supplemental report will be submitted.

In order to ensure that insufficient criteria for the content of other recurring reports did not result in similar omissions, the following action will be taken:

- ° A sample review of other required recurring reports which have been submitted will be conducted by the responsible organization to verify compliance with regulatory guidance.
- ° The current guidance provided for the preparation of recurring reports will be evaluated by the responsible organization. Based upon the complexity of the report, departmental guidelines will be developed, if required, to ensure sufficient guidance is provided.

III. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved upon submittal of the supplemental report. The report is scheduled for transmittal by November 15, 1986.

Other corrective actions discussed in Section II are scheduled for completion on or before January 1, 1987.

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