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SUBJECT: Responds to NRC 880805 ltr re violations noted in Insp Repts  
 50-528/88-18 & 50-530/88-18.

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## Arizona Nuclear Power Project

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

102-00929-DBK/TDS/RJR

September 6, 1988

U. S. Nuclear Regulatory Commission  
NRC Document Control Desk  
Washington, D.C. 20555

Reference: Letter from R. J. Pate, NRC to D. B. Karner, ANPP dated August 5, 1988; Subject: NRC Inspection of Palo Verde Units 1, 2 and 3 (50-528/88-18, 50-529/88-19, 50-530/88-18)

Dear Sir:

Subject: Palo Verde Nuclear Generating Station  
Units 1 and 3  
Docket No. STN 50-528 (License NPF-41)  
STN 50-530 (License NPF-74)  
Response to Notice of Violation, 50-528/88-18-01 and 530/88-18-01  
File: 88-070-026

This letter is provided in response to the routine onsite inspection conducted by Messrs. T. Polich, J. Ball, and G. Fiorelli of NRC Region V from May 22 through July 4, 1988. Based on the results of the inspection, two (2) violations of NRC requirements were identified. The violations are discussed in Appendix A of the referenced letter.

Due to the similarity of root causes and corrective actions, both violations and ANPP's response are combined in a single attachment to this letter. If you should have any questions regarding this response, contact Mr. Timothy Shriver of my staff at (602) 393-2521.

Very truly yours,

Donald B. Karner  
Executive Vice President  
Project Director

8809140222 880906  
PDR ADDCK 05000528  
G PNU

DBK/TDS/RJR/kj

### Attachments

cc: E. E. Van Brunt, Jr. (all w/attachments)  
J. G. Haynes  
J. B. Martin  
T. J. Polich  
M. J. Davis  
A. C. Gehr

IE01  
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APPENDIX A

NOTICE OF VIOLATION

Arizona Nuclear Power Project  
P. O. Box 52034  
Phoenix, Arizona 85072-2034

Docket Nos. 50-528/50-530  
License Nos. NPF-41/NPF-74

During an inspection conducted on May 22, through July 4, 1988, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR 2, Appendix C, the following violations were identified. Item A is associated with License No. NPF-74. Item B is associated with License No. NPF-41.

Technical Specification 6.8.1 states, in part, "Written procedures shall be established, implemented, and maintained covering the activities referenced below:

The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978...."

Regulatory Guide 1.33, Revision 2, February 1978 recommends "Procedures for Startup, Operation, and Shutdown of Safety-Related PWR Systems".

1. ANPP Procedure 41OP-1EC02, entitled "Essential Chilled Water Train "B" (EC)", Revision 6, Section 7.0, "Chemical Addition to Essential Chilled Water Train "B" dated May 11, 1988, states in part that subsequent to the addition of chemicals to the system in step 7.3.17, "close chemical addition tank outlet valve EC-V101".



Contrary to the above, on June 14, 1988, Unit 1 valve EC-V101 was found to be in the open position following the addition of chemicals to the system on June 10, 1988

This is a Severity Level IV Violation (Supplement I).

2. ANPP Procedure 430P-3EW01, entitled "Essential Cooling Water System (EW) Train "A", Revision 2, Section 11.0, "Chemical Addition to Train "A" dated November 10, 1986, states in part that subsequent to the addition of chemicals to the system in steps 11.3.8 and 11.3.9, close chemical addition tank outlet valve EW-V051 and inlet valve EW-V005, respectively."

Contrary to the above, on June 13, 1988, Unit 3 valves EW-V051 and EW-V005 were found to be in the open position following the addition of chemicals to the system on June 7, 1988.

This is a Severity Level IV Violation (Supplement 1).

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I. REASON FOR VIOLATION

An evaluation of the events described in the Notice of Violations identified that the failure to use existing procedures during the chemical addition led to the improper restoration of the systems. However, a more detailed examination of the Administrative Controls applicable to this area identified a contributory cause which permitted the conduct of the chemical addition activity without the established procedures being present. Administrative Control Procedure 40AC-9ZZ02 "Conduct of Shift Operations" states in part, "Routine operations which are frequently performed may or may not have the procedure present at the Shift Supervisor's discretion." This position is also endorsed by ANSI N18.7 1976 Section 5.2.2 which states, "Routine procedural actions that are frequently repeated may not require the procedure to be present." The addition of chemicals is considered routine in nature, requiring only the addition of chemicals to a tank and the opening of an inlet and outlet isolation valve. Upon completion of the task, the inlet and outlet isolation valves are shut. Based upon the simplicity of this task and its repetitive nature, the addition of chemicals is considered to fall within this scope. Therefore, the procedures were not required to be present.

Further discussion with the responsible management identified that the Administrative Control was intentionally developed to be broad scoped which would allow Unit Management to individualize the requirements to their staff based on experience and education. Subsequently, the



operations' staff adopted an interpretation that if the operator and his Shift Supervisor believe he can accomplish a routine task without a procedure, the intent of the Administrative Control is satisfied. As these events show, this definition is too broad to be practical for consistent application which could permit situations to develop where management's expectations were not met. Based upon these facts, the cause of the violations has been determined to be procedural violations caused by inappropriate communication of the Unit Management's expectations regarding the conduct of operations without a procedure being present.

## II. CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

In each case, at the time of discovery, a formal valve lineup was conducted which restored the mispositioned valves to their required position. Unit Management also issued a Night Order defining the need to follow the applicable procedure and reiterated the requirement to perform an independent verification of the restoration of safety-related equipment. Further, personnel involved in these events were appropriately counseled.

In order to determine the potential impact the mispositioned valves may have had on the system, an engineering evaluation was conducted. The results of the evaluation determined that, although the chemical addition tanks are classified as non-class, the tanks and associated piping are respectively designed to seismic class IX and I requirements,

therefore, the integrity of the system was not compromised by the valves being left in the open position.

III. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

ANPP believes that the Administrative Control provides sufficient generic guidance to the Units regarding the use of procedures. Since the requirement for use of procedures for routine tasks depends on the experience/education of the individual operator, the Unit must take an active role in establishing the criteria which will be utilized to determine when procedures are required to be present during an activity. As a result, a definitive position regarding this issue will be developed and the Unit Operations Managers will meet with each of their respective Shift Supervisors to define their expectations regarding the use of procedures particularly with respect to when procedures are required to be present. ANPP believes that this action will clarify management's intent and preclude recurrence of events such as these.

IV. DATE OF FULL COMPLIANCE

Full compliance was achieved with the restoration of the mispositioned valves on June 13 and June 14, 1988.

