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## Arizona Nuclear Power Project

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102-01069-DBK/TDS/KLMC  
December 19, 1988

DONALD B. KARNER  
EXECUTIVE VICE PRESIDENT

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Reference: Letter from G. P. Yuhas, Chief, Emergency Preparedness and Radiological Protection Branch, U. S. Nuclear Regulatory Commission to Arizona Nuclear Power Project, Attn. D. B. Karner, Executive Vice President, dated December 2, 1988.

Dear Sir:

Subject: Palo Verde Nuclear Generating Station  
Units 1, 2 and 3  
Docket No. STN 50-528 (License No. NPF-41)  
STN 50-529 (License No. NPF-51)  
STN 50-530 (License No. NPF-74)  
Reply to a Notice of Violation - 528/88-40-01  
File: 88-056-026

This letter is provided in response to the routine inspection conducted by Mr. G. Cicotte from October 31 through November 4, 1988. Based upon the results of this inspection a violation of NRC requirements was identified. The violation is discussed in Appendix A of the referenced letter.

The violation and ANPP's response are provided in the attachment to this letter. If you should have any questions regarding this response, contact Mr. Timothy Shriver of my staff at (602) 393-2521.

*DB Karner/14*

DBK/TDS/KLMC/kj

### Attachments

cc: J. G. Haynes (all w/attachments)  
J. B. Martin  
T. J. Polich  
M. J. Davis  
T. L. Chan  
A. C. Gehr

88-01050059  
8/11  
*[Signature]*



APPENDIX A

NOTICE OF VIOLATION

Arizona Public Service Company  
Palo Verde Nuclear Generating  
Station Units 1, 2, and 3

Docket Nos. 50-528, 50-529, 50-530  
License Nos. NPF-41, 51, 74

During an inspection conducted October 31 - November 4, 1988, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), as modified by 53 Fed. Reg. 40019 (October 13, 1988), the violation is listed below:

A. Technical Specification 6.8, "Procedures and Programs," states in part:

"6.8.1 Written procedures shall be established, implemented, and maintained covering the..."

"i. Offsite Dose Calculation Manual [ODCM]...."

Licensee Procedure 75RP-OZZ08, "Radiological Environmental Air Sample Collection," Revision 0, dated 3-4-88, states in part:



APPENDIX A  
NOTICE OF VIOLATION

(Continued)

"1.0 Purpose

1.1 This procedure provides the requirements for the weekly issue and exchange of particulate air filters and charcoal cartridges as required by the ODCM and the REMP [Radiological Environmental Monitoring Program]...."

"6.1.3.4 Flowmeter reading (If reading is 1.5 CFM no adjustments are necessary, otherwise adjust to 1.5 CFM)."

Contrary to the above, at approximately 12:45 p.m. MST, on November 2, 1988, the flowmeter for environmental sampling station Nos. 15 and 14a was returned to service without having been adjusted to 1.5 CFM.

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



REPLY TO NOTICE OF VIOLATION 528/88-40-01

I. REASON FOR VIOLATION

On November 2, 1988, the weekly environmental air sampling was performed by an ANPP contract employee. The air sampling was performed using procedure 75RP-OZZ08, "Radiological Environmental Air Sample Collection", Revision 0, dated March 4, 1988. During the performance of the air sampling at predetermined sites 14a and 15a, the inspector observed that the flowmeter reading recorded prior to adjustments was 2.1 CFM and 2.0 CFM respectively. The individual then adjusted the flowrate to obtain a flowmeter reading at site 14a of 2.0 CFM.

As discussed in the inspection report, procedure 75RP-OZZ08 paragraph 6.1.3.3 states;

"Flowmeter reading (If reading is 1.5 CFM no adjustments are necessary; otherwise adjust to 1.5 CFM).

A preliminary evaluation conducted by ANPP confirmed the inspector's observations that the sample station flowrate was adjusted to obtain a flowmeter reading of 2.0 CFM or was left in the as found condition of 2.0 CFM. As a result, ANPP initiated an evaluation to determine the root cause of the deficiency and to identify the necessary corrective actions. The results of that evaluation are discussed in the following paragraphs.



REPLY TO NOTICE OF VIOLATION 528/88-40-01

.....Prior to November, 1987 the contractor had been supplied flowmeters, used to verify/adjust the flowrates at the various sampling sites, which measured air flow on a percentage scale. The scale range is 0-100% with 100% equaling 2.5 CFM  $\pm 5\%$ . In November, 1987 the contractor was supplied replacement meters which could be permanently installed at the collection sites. The replacement meters measured air flow on a scale ranging from 0-6 CFM  $\pm 10\%$ . The contractor independently evaluated the two devices and determined that a reading of 2.0 CFM on the replacement meter equated to a reading of 60% on the original meter and would therefore provide a true measurement of 1.5 CFM. The procedural controls, as previously discussed, were revised to address the replacement meters and required the air flow to be adjusted to obtain a meter reading of 1.5 CFM. The intent of the procedure was to ensure a sample flow rate through the collection equipment of 1.5 CFM. Therefore, based upon the unapproved evaluation, the contractor utilized a flowmeter reading of 2.0 to adjust the sampling site flowrates. This decision was discussed with and concurred with by an ANPP representative. Based upon these events, the "root causes" of the identified violation are the failure of the contract organization to adhere to established procedural controls and the failure of the ANPP representative to initiate the required evaluations and procedural changes that would have authorized the contractor's actions.



REPLY TO NOTICE OF VIOLATION 528/88-40-01

II. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

As an immediate corrective action, an evaluation was performed to determine the effect of using 2.0 CFM vice the required 1.5 CFM flowrate. The difference in the calculated activity results is approximately 25 percent in the conservative direction.

Additionally, the original flowmeters which were utilized by the contractor have been returned to the contractor for use. The meters' calibration stickers have been specifically annotated that a 100% scale reading equates to a 2.5 CFM flowrate. A change has been approved to the governing procedure, 75RP-0ZZ08, clarifying the readings required to obtain the appropriate flowrate.

III. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

To address the fact that the contract individual believed he could deviate from established procedural controls based upon an unapproved technical justification, a letter was issued to the contractor from ANPP on November 10, 1988. The letter informed the contractor of this event and emphasized that any deviation from procedural controls was unacceptable. The letter also provided instructions that whenever an individual performing a procedure has a question or concern regarding the procedure's adequacy, technical accuracy, or requirements he shall stop the activity and resolve the matter with ANPP management prior to



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proceeding. ANPP has requested that the contractor brief the responsible personnel to ensure they understand and comply with these instructions. In addition, a meeting was held by ANPP on December 1, 1988 with the responsible contract personnel to reinforce the ANPP requirements for procedural compliance.

As an additional corrective action, ANPP has evaluated the other ANPP procedures utilized by the contractor to implement the REMP. The evaluation identified no technical deficiencies.

The ANPP representative who was made aware of the procedural deviation by the contractor and failed to take appropriate action has been counseled. Based upon the individual's previous performance, no additional actions are deemed necessary at this time. However, the Radiation Protection Standards section responsible for the Radiological Environmental Monitoring Program (REMP) will be briefed on the necessity to properly overview a contractor's performance and to conduct a careful review of the documentation submitted by the contractor placing particular emphasis on ensuring procedural compliance.

IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All the corrective actions stated in Sections II and III have been implemented with the exception of the briefings to be given to the contract personnel and the Radiation Protection Standards section



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personnel responsible for the implementation of the REMP. ANPP  
estimates the completion of these briefings by February 1989.



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