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 FACIL:STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528
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SUBJECT: LER 88-025-00:on 881201,surveillance test interval missed on
 cathodic protection sys.

W/8 ltr.

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 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:Standardized plant.

05000528/

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Palo Verde Unit 1										DOCKET NUMBER (2) 0 5 0 0 0 5 2 8 1 OF 0 7										PAGE (3) 1 OF 07			
TITLE (4) Surveillance Test Interval Missed on Cathodic Protection System																							
EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)													
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES N/A					DOCKET NUMBER(S) 0 5 0 0 0									
1	2	0	1	8	8	8	8	0	2	5	0	0	0	2	0	6	8	9	N/A 0 5 0 0 0				
OPERATING MODE (9) 1		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																					
POWER LEVEL (10) 1 0 0		20.402(b)				20.406(c)				50.73(a)(2)(iv)				73.71(b)									
		20.406(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)				73.71(c)									
		20.406(a)(1)(ii)				50.36(c)(2)				50.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)									
		20.406(a)(1)(iii)				50.73(a)(2)(i)				50.73(a)(2)(vii)(A)													
		20.406(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(vii)(B)													
		20.406(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(iii)													
LICENSEE CONTACT FOR THIS LER (12)																							
NAME Timothy D. Shriver, Compliance Manager												TELEPHONE NUMBER 6 0 2 3 9 3 - 2 5 2 1											
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																							
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC													
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR							
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)												<input checked="" type="checkbox"/> NO											

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single space typewritten lines) (16)

At approximately 1330 MST on January 5, 1989, Palo Verde Unit 1 was in Mode 1 (POWER OPERATION) when a Surveillance Program Control Group individual discovered that Surveillance Procedure 73ST-1QH01 (60 day Surveillance Test of the Diesel Fuel Cathodic Protection) had not been completed within the Technical Specification required frequency. The surveillance test interval was exceeded at approximately 1959 MST on December 1, 1988. The test frequency had been reduced from 92 days to 61 days by amendment 27 to the Facility Operating License; however, the appropriate Administrative Control procedure was not revised to reflect the new frequency. The test was successfully completed December 8, 1988.

The cause of the event was an inadequate review of the amendment. As corrective action to prevent recurrence the surveillance interval was revised to be consistent with the amendment. The Administrative Control procedure for the review and implementation of amendments to the License is being revised to include appropriate reviews.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO 3150-0104

EXPIRES: 8/31/86

FACILITY NAME (1) Palo Verde Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 5 2 8 8 8	LER NUMBER (6)			PAGE (3)		
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

I. DESCRIPTION OF WHAT OCCURRED:

A. Initial Conditions:

On December 1, 1989 Unit 1 was in Mode 1 (POWER OPERATION) at 100 percent power when the surveillance test interval was exceeded.

B. Reportable Event Description (Including Dates and Approximate Times of Major Occurrences):

Event Classification: A condition prohibited by the Plant's Technical Specifications (TS)

At approximately 1330 MST on January 5, 1989, a surveillance program control group individual (non-licensed, utility) discovered that Surveillance Procedure 73ST-1QH01 (60 day Surveillance Test of Diesel Fuel Cathodic Protection) had not been completed within the required frequency. The Surveillance Test was exceeded at approximately 1959 MST on December 1, 1988. The test frequency had been reduced from 92 days to 61 days by amendment 27 to the Facility Operating License; however, the appropriate Administrative Control procedure was not updated to reflect the new frequency. The test was satisfactorily completed December 8, 1988.

In July 1986, a proposed amendment to the Facility Operating License was submitted to the Nuclear Regulatory Commission. Among the items in the proposed amendment was a change to Surveillance Requirement 4.8.1.3.1 reducing the frequency from 92 days to 61 days.

In December 1986, a Quality Assurance Corrective Action Report was issued which stated that the proposed amendment had not received a technical review to determine which procedures were impacted by the proposed amendment. As part of the corrective action, the proposed amendment was reviewed by an I&C Maintenance Engineer (utility, non-licensed) and a Compliance Engineer (utility, non-licensed). The procedure used to perform the Surveillance Test, 60 Day Surveillance Test of the Diesel Fuel Cathodic Protection (73ST-1QH01) was reviewed and determined to already require a 60 day interval and thus, did not require revision. However, neither individual identified the need to revise the Administrative Control procedure Technical Specifications Surveillance Requirements Cross Reference - Unit 1 (73AC-1ZZ24) which is used to schedule the performance of Surveillance Tests. The responsibility to identify the change to 73AC-1ZZ24 was not specifically delineated and the appropriate personnel (i.e., Operations Engineering, Electrical and Surveillance Test Program Coordinator) were not required to review the amendment.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

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EXPIRES: 8/31/88

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TEXT (If more space is required, use additional NRC Form 368A's) (17)

On March 2, 1988 Amendment 27 to the Facility Operating License was issued. On March 21, 1988 the amendment was transmitted from the Licensing Department to the Plant Standards Department for distribution. Upon receipt, Plant Standards personnel (utility, non-licensed) could not find any technical review forms indicating procedures which required change as a result of the amendment. Due to the length of time since Plant Review Board approval (July 9, 1986) and the intervening PVNGS reorganization, Plant Standards personnel issued correspondence to affected departments requesting a review for procedures impacted by the amendment.

The Engineering Evaluations Technical Engineering Supervisor (utility, non-licensed) received the technical review form for Amendment 27. Although the Technical Engineering Supervisor administratively controls 73AC-1ZZ24, the procedure requires that the appropriate departments engaged in the surveillance test activity are primarily responsible to identify the necessary changes to 73AC-1ZZ24. Therefore, his review did not consider the change necessary to 73AC-1ZZ24.

The Engineering Evaluations Manager (utility, non-licensed) was forwarded the technical review form for Amendment 27. Further distribution of this form could not be determined. However, the individual (utility, non-licensed) responsible for the performance of 73ST-1QH01 did not receive the form. Therefore, the required change to 73AC-1ZZ24 was not identified.

Plant Standards personnel received responses from other departments including Reactor Engineering/Engineering Evaluations. Based on the response received from Reactor Engineering/Engineering Evaluations, Plant Standards personnel believed that all Engineering Evaluation's reviews were complete. On April 4, 1988 Plant Standards personnel forwarded the change to the Drawing and Document Control Department for issuance. On April 6, 1988 the change was entered in the Unit 1 Technical Specifications.

On March 28, 1988, the Cathodic Protection System was declared inoperable for the performance of a modification in accordance with and approved engineering document. At the time Amendment 27 was implemented, the system was inoperable. The system was restored to operability on April 13, 1988.

The required surveillance test was conducted April 13, May 17, July 25, Sept. 22, and December 8, 1988. A review of these dates indicated that on December 1, 1988, the test interval exceeded the 3.25 times the surveillance interval allowed by Technical Specification 4.0.2(b). The test was conducted on December 8, 1988. Thus, the test interval was exceeded by approximately seven days. During this interval, the ACTION requirements for this Limiting Condition for Operation were met.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

- C. Status of structures, systems, or components that were inoperable at the start of the event that contributed to the event:

On December 1, 1988, the Diesel Fuel Cathodic Protection system was administratively inoperable when the Surveillance Test interval was exceeded. No other structures, systems, or components were inoperable which contributed to this event.

- D. Cause of each component or system failure, if known:

Not applicable - no component or system failures were involved.

- E. Failure mode, mechanism, and effect of each failed component, if known:

Not applicable - No failed component was involved.

- F. For failures of components with multiple functions, list of systems or secondary functions that were also affected:

Not applicable - The Cathodic Protection System does not perform multiple functions.

- G. For failure that rendered a train of a safety system inoperable, estimated time elapsed from the discovery of the failure until the train was returned to service:

Not applicable - The Cathodic Protection System does not render a train of a safety system inoperable. Specifically, the Diesel Fuel System is still capable of performing its function.

- H. Method of discovery of each component or system failure or procedural error:

The oversight in not updating 73AC-1ZZ24 was discovered during an informal review of Amendment 27 of the Facility Operating license by an individual (utility, non-licensed) in the Surveillance Program Control Group. Through experience, this individual recognized the performance interval in the amendment did not match the actual interval being used. Since the affected Surveillance Test (73ST-1QH01) section 1.1.1 states, "The test frequency shall be at a minimum of once every sixty (60) days" the error was in the administration of the test (73AC-1ZZ24), and not in the surveillance test itself.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/86

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

I. Cause of Event:

The root cause of this event was inadequate administrative controls for the review of license amendments. The procedures did not adequately specify the responsibilities and the appropriate departments for review. Specifically, Facility Operating License Amendment 27 was not properly reviewed for changes to 73AC-1ZZ24 and the affected ST performance group did not receive the amendment for review.

Prior to the amendment issuance, the responsible ST performance individual (utility, non-licensed) identified the discrepancy between the interval specified in 73AC-1ZZ24 and 73ST-1QH01. The individual discussed this discrepancy with the Surveillance Program Coordinator (utility, non-licensed). They determined that 73AC-1ZZ24 specified the correct interval (92 days) as required by TS 4.8.1.3.1. The responsible ST performance individual made a cognitive personnel error by either not performing the ST as specified in 73ST-1QH01 (i.e., once per 60 days) or revising 73ST-1QH01 to be consistent with TS and 73AC-1ZZ24.

J. Safety System Response:

Not applicable - No safety system response was expected, nor did any occur.

K. Failed Component Information:

Not applicable - There were no failed components.

II. ASSESSMENT OF THE SAFETY CONSEQUENCES AND IMPLICATIONS OF THIS EVENT:

No adverse safety consequences or implications resulted from this event.

The Cathodic Protection System provides corrosion protection for the Diesel Fuel Oil Storage tanks. Since the ACTION statement for the Limiting Condition for Operation was never exceeded during this event, there is no impact on the health and safety of the public.

Additionally, the Surveillance Test was successfully performed both before and after the event. Thus, the system was functional at all times.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO 3150-0104

EXPIRES: 8/31/88

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

III. CORRECTIVE ACTIONS:

A. Immediate:

No immediate corrective action was required since the ST was successfully performed prior to event discovery.

B. Action to Prevent Recurrence:

The Surveillance Interval in 73AC-1ZZ24 was revised to be consistent with the TS as amended. Additionally, Amendment 27 was reviewed to determine if any other oversights existed. Surveillance Requirement 4.8.1.3.2 had been revised from 18 months to 12 months and was not reflected. The cause of this error is directly related to the cause of the errors described in this report. The performance interval of the test was reviewed and determination made that the 12 month surveillance frequency has been met. This change was also made. Since this amendment was made to revise the Unit 1 TS to be consistent with Unit 2 and 3 TSs, the problem identified did not exist in Unit 2 or 3.

Other amendments to the Unit 1, Unit 2, and Unit 3 operating licenses will be reviewed to ensure the surveillance program accurately reflects surveillance interval changes made through amendments to the Technical Specifications.

As an interim measure until the appropriate procedures are revised (as discussed in the following paragraph), direction will be provided to Engineering Evaluations personnel to clarify their responsibilities for review of amendments to Technical Specifications and maintaining consistency between the ST, TS, and 73AC-1, 2, 3ZZ24.

The procedure governing License Document changes is being revised to require the following:

1. Operating License and TS change packages will be transmitted to specific departments for review, and
2. Affected departments shall complete impact sheets which delineate the procedures that would be affected by the changes.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO 3150-0104

EXPIRES: 8/31/88

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

IV. PREVIOUS SIMILAR EVENTS:

Although Surveillance Test intervals have previously been exceeded, this is the first case of the appropriate testing interval not being updated as a result of an amendment to the Facility Operating License.

Supplement No. 1 to Licensee Event Report (LER) 88-002-00 for License NPF-41 found that procedural controls for the implementation of license amendments were inadequate. The revision to the procedure governing License Document changes discussed in section III.B is also addressed in LER 88-002-01.



Arizona Nuclear Power Project

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

192-00448-JGH/TDS/RJR
February 6, 1989

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

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Docket No. STN 50-528 (License No. NPF-41)
Licensee Event Report 88-025-00
File: 89-020-404

Attached please find Licensee Event Report (LER) No. 88-025-00 prepared and submitted pursuant to 10CFR 50.73. In accordance with 10CFR 50.73(d), we are herewith forwarding a copy of the LER to the Regional Administrator of the Region V office.

If you have any questions, please contact T. D. Shriver, Compliance Manager at (602) 393-2521.

Very truly yours,

J. G. Haynes
Vice President
Nuclear Production

JGH/TDS/RJR/kj

Attachment

cc: D. B. Karner (all w/a)
E. E. Van Brunt, Jr.
J. B. Martin
T. J. Polich
M. J. Davis
A. C. Gehr
INPO Records Center

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