

Arizona Public Service Company

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102-01402-WFC/TDS/TRB

September 8, 1989 11:06

WILLIAM F. CONWAY  
EXECUTIVE VICE PRESIDENT  
NUCLEAR

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

- Reference: (a) Letter from A. Chaffee, Deputy Director, Division of Reactor Safety and Projects, NRC to W. F. Conway, Executive Vice President Nuclear, Arizona Public Service, dated August 11, 1989
- (b) Letter from W. F. Conway, Executive Vice President Nuclear, Arizona Public Service to U. S. Nuclear Regulatory Commission, dated August 28, 1989

Dear Sir:

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
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 Notice of Violation - 50-528, 529, 530/89-34-01  
File: 89-070-026

This letter is provided in response to the report of the inspection conducted by Messrs. A. Johnson and W. P. Ang from July 17-21, 1989. Based upon the results of the inspection, a violation of NRC requirements was identified. The violation is discussed in Appendix A of reference (a). A restatement of the violation and PVNGS's response are provided in Appendix A and Attachment 1, respectively, to this letter.

Reference (a) expresses concern with respect to the lack of timeliness with which corrective actions resulting from PVNGS's Incident Investigation Program (IIP) are implemented and requests our response to this concern. As I noted in reference (b), delays in the implementation of corrective actions are not acceptable and I outlined several steps which had been taken to address this matter. Additionally, I stated that in order to ensure that the entire scope

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of this issue is fully understood and that corrective actions are sufficiently comprehensive, an evaluation was being conducted of the Incident Investigation Program (IIP). The results of that evaluation are contained in Attachment 2.

I believe that the enhancements to the IIP described in reference (b) together with those discussed in Attachment 2 will ensure timely correction of matters identified in the IIP. We intend to monitor this program to assure the effectiveness of the actions.

Very truly yours,



WFC/TDS/TRB/kj

Attachments

cc: J. B. Martin  
T. J. Polich  
T. L. Chan  
E. E. Van Brunt, Jr.  
A. C. Gehr  
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APPENDIX A

NOTICE OF VIOLATION

Arizona Nuclear Power Projects  
Palo Verde Units 1, 2, and 3

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

During an NRC inspection conducted from July 17-21, 1989, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C (1988), the violations are listed below:

- A. 10 CFR 50 Appendix B Criterion XVI requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected. Post Trip Review Report (PTRR) 2-88-001, concern number 5, dated November 22, 1988, identified a failure to change operating procedures affected by site modification 2-SM-SF-05 and subsequently contributed to a reactor trip. The report required review of the site modification process procedure and a sampling review of existing site modifications to assure that procedures affected by other site modifications have been changed. These corrective actions were required to be completed by February 22, 1989.

Contrary to the above, the PTRR 2-88-001, concern number 5, corrective actions had not been completed as of July 21, 1989.



ATTACHMENT 1

REPLY TO NOTICE OF VIOLATION 50-528, 529, 530/89-34-01

I. REASON FOR VIOLATION

On November 22, 1988, Post Trip Review Report (PTRR) 2-88-001 was approved by plant management. As stated in the NRC inspection report, concern 5 required additional corrective action to assure that similar instances did not exist where site modifications (Site-Mods) were completed without issuance of changes in affected procedures. Specifically, the additional corrective action required that:

"1. Engineering Evaluations Department with the Plant Standards and Control Department evaluate:

- a. the current Site-Mod procedure in light of this event,
- b. the current System Engineer Program, and
- c. the current interface responsibilities between system engineers and Plant Standards and Control personnel with respect to determining the need for procedure changes following design changes,

to determine if they are designed to prevent a similar event in the future. If any deficiencies are noted, initiate action to correct the applicable procedures and/or programs."



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- "2. Engineering Evaluations Department to perform a "backfit" cross-discipline review on a representative sample of current Site-Mods. From this review, reevaluate the impact on plant operations and provide the results to the Plant Standards and Control Department."
- "3. The Plant Standards and Control Department, when provided with the results of Engineering Evaluation's review, will evaluate the additional impacts on plant operation noted, and identify and initiate PCN's required for Station Manual procedures."

Action 1 had an assigned due date of 60 days following PTRR approval (January 22, 1989); Action 2 had an assigned due date of 90 days following PTRR approval (February 22, 1989); and Action 3 required completion 90 days following completion of Action 2 (May 22, 1989, assuming timely completion of Action 2).

Action 1 was completed in May, 1989, with no significant procedural deficiencies identified. Three Instruction Change Requests (ICR's) were generated to enhance the procedures and the changes will be included during the next scheduled procedure revision (December, 1989). As of September 5, 1989, Action 2, and hence, Action 3, had not been completed.

For Action 2, although a review of several Site-Mods has been ongoing, the entire sample designated for review has not been completed. The review of Site-Mods, as of September 5, 1989, resulted in only minor changes in procedures, none of which would have affected future plant events.

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For Action 2, although a review of several Site-Mods has been ongoing, the entire sample designated for review has not been completed. The review of Site-Mods, as of September 5, 1989, resulted in only minor changes in procedures, none of which would have affected future plant events.

The commitment dates for actions 2 and 3 were not met because of:

1. Inappropriate prioritization of the corrective actions by the Engineering Evaluations Department; and
2. Failure of responsible personnel to ensure timely completion of overdue corrective actions.

II. CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

For the specific PTRR corrective actions identified, the "backfit" cross-discipline review on the remaining sample of current Site-Mods (Action 2) is currently in process and will be completed by September 20, 1989.

Upon completion of the review, the results will be evaluated to determine potential impacts on plant operation in accordance with Action 3. Appropriate changes to procedures, as necessary, will be initiated. Action 3 is scheduled to be completed by October 20, 1989.

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

To ensure that corrective actions (both backlogged and future corrective actions) resulting from APS's Incident Investigation Program (IIP) are accomplished in a timely manner, an evaluation of the IIP has been completed. The evaluation and corrective actions are contained in Attachment 2 to this letter.



IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance for the cited violation will be achieved upon completion of the evaluation of the cross-discipline review of current Site-Mods and initiation of required procedure changes (Action 2 and 3). These actions will be complete by October 20, 1989.

Full compliance ( i.e. completion of corrective action with respect to the current backlog of matters identified in IIP's) will be achieved upon disposition of the backlogged corrective actions, as set forth in Attachment 2 to this letter.





ATTACHMENT 2

EVALUATION OF THE INCIDENT INVESTIGATION PROCESS AND RESOLUTION OF CORRECTIVE ACTIONS

The need to evaluate the Incident Investigation Program (IIP), in light of initial experience in its implementation, was identified by APS during the investigation of the Unit 3 reactor trip on March 3, 1989. The evaluation was identified on the Post-Restart Action Item List, initially transmitted to the NRC on June 8, 1989, and on the updated Post-Restart list transmitted on July 27, 1989.

In addition, as a result of concerns with regard to the backlog of incomplete corrective actions noted by the NRC in its letters to APS on July 28, 1989 and the letter transmitting the violation addressed in Attachment 1, and further identified by the APS Quality Assurance (QA) organization (Corrective Action Report (CAR) CA89-0046, on August 9, 1989), a plan to address the corrective action backlog was developed and is being implemented.

The Shift Technical Advisor (STA) Group performed an evaluation of the effectiveness of the IIP implementation. The evaluation showed that changes were necessary to streamline the problem identification and report generation process without compromising the necessary depth of investigation. Since Category 3<sup>1</sup> investigations require the most resources and time, efforts to

<sup>1</sup> Those events which have potential or real impact on Site or Unit productivity, nuclear safety, normal plant operation, task performance or equipment operation. Events in this category have resulted in sufficient impact on operation that corrective actions must be taken to prevent recurrence. Category 3 represents the least safety significant category of incident investigations.



enhance the IIP focused in that area. The major changes to the IIP are as follows;

1. Final reports for Category 3 investigations will be simple fill in the blank forms which will aid report preparation while maintaining requirements for consistent format. The option still exists for more detailed reports to follow the same format.
2. The Category 3 Administrative Control procedure includes a flowchart of the investigation process from the Investigation Director assigning a Lead Investigator through report approval. This will assist personnel attempting to perform investigations who had difficulty in understanding the flowpath of the process.
3. An optional checklist has been incorporated in the Category 3 Administrative Control Procedure that will aid individuals performing investigations in planning and prioritizing investigation activities.
4. Extraneous and redundant sections are being deleted from the procedures. Procedures are now easier to follow
5. The initial review process for a Problem Resolution Sheet (PRS) has been changed. The organizational Director responsible for a particular event is now directly contacted by the duty STA for the shift on which the PRS was originated. This simplifies the PRS flow and expedites assignment of the PRS to an Investigation Director.



The changes to the IIP, as summarized above, will result in a more timely method of conducting, documenting, and disseminating investigation results and assist in expediting the identification and, hence, the implementation of corrective actions.

The second issue relating to the IIP was the untimely implementation of corrective actions resulting from an investigation. As discussed previously, this was identified by both the NRC and APS QA and centered around the large number of "backlogged" or past due corrective actions. The backlog of corrective actions have been traced to two fundamental causes; 1) failure of responsible organizations to properly prioritize the corrective actions resulting from an investigation; and, 2) failure of responsible personnel to take action when the overdue actions were identified.

To reduce the current backlog of open corrective actions, the items have been segregated into each organizational Director's area of responsibility and transmitted to them. This will establish the accountability of that Director to effectively track the resolution of the actions. Executive management has directed that for the current backlog of actions, each responsible organizational Director will have 90 days (November 30, 1989) to disposition all items assigned to him. Should an item not be dispositioned by that date, the action will be escalated to the Executive Vice President, Nuclear.

For corrective actions resulting from incident investigations conducted after September 1, 1989, executive management has established a goal to achieve resolution of corrective actions within 120 days of incident occurrence.



Consistent with that goal, a periodic report of outstanding corrective actions will be provided to responsible and executive level management. Additionally, the IIP has been changed to require approval of recommended corrective actions by both the responsible organizational Director and the Director having assigned action. The approval by both Directors will ensure that only those recommendations that are effective and beneficial are accepted as corrective actions. This also assures that appropriate levels of management are cognizant of the corrective actions.

Lastly, in response to the QA CAR (CA89-0046) which identified the lack of a central organization with responsibility and authority to assure timeliness of corrective action disposition, the procedure for tracking IIP corrective actions will be changed to transfer corrective action tracking to the QA organization. Overdue corrective actions will be escalated to executive level management.



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 CONWAY, W.F. Arizona Public Service Co. (formerly Arizona Nuclear Power  
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APPENDIX A

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Docket Nos. 50-528, 50-529, and 50-530  
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