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SUBJECT: Provides update to violations noted in Insp Rept
 50-529/89-03.Corrective actions:

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Arizona Public Service Company
PALO VERDE NUCLEAR GENERATING STATION
P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

102-01607-JNB/TRB/JJN
February 21, 1990

JACK N. BAILEY
VICE PRESIDENT
NUCLEAR SAFETY AND LICENSING

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

Reference: a) Letter from D. B. Karner, Executive Vice President, Palo Verde Nuclear Generating Station, to U. S. Nuclear Regulatory Commission, dated March 27, 1989.

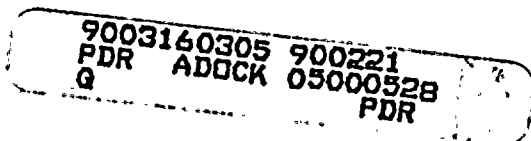
b) Letter from J. N. Bailey, Vice President, Nuclear Safety and Licensing, Palo Verde Nuclear Generating Station, to U. S. Nuclear Regulatory Commission, dated October 8, 1989.

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 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)
Addendum to Reply to a Notice of Violation - 529/89-03-01
File: 90-070-026

This letter provides an update on the status of specific corrective actions discussed in References a and b. These corrective actions involve:

1. The reorganization of Radiation Protection, Chemistry, Radiological Effluents, and Radiation Waste Departments.
2. The revision of Radiological Effluent Program and implementing procedures.
3. The development and implementation of training on the new Radiological Effluent Procedures.
4. The update of the Radiation Monitoring System drawings.
5. The design and implementation of plant modifications to the condenser effluent radiation monitors.



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REORGANIZATION

As stated in Reference B, APS intends to reorganize the Radiation Protection, Chemistry, Radiological Effluent, and Radiological Waste Departments. This reorganization is proceeding more slowly than anticipated to ensure all responsibilities are properly defined. Many of the new positions for the new Radiological Effluent group have been filled and the individuals trained. Attachment 1 provides a status of those actions which are complete and a new schedule for the remaining actions.

PROCEDURES

As stated in Reference A and B, the Radiological Effluent Program and procedures are being rewritten to provide detailed instruction or reformatted to facilitate use. In particular, the Surveillance Test procedures have been revised and approved. Included with these Surveillance Test procedures is the procedure controlling the activity which was the subject of the Notice of Violation. The remaining procedures are being revised in concert with the reorganization discussed above. Attachment 2 provides a status of those actions which are complete and a new schedule for the remaining actions.

TRAINING

The development and implementation of training for the Radiological Effluent Program is dependent on the revision of the procedures discussed above. Training development has been completed for initial courses: Plant Systems and Components, RMS Overview, and Effluents Program Administrative Controls and continuing courses: Industry Events and Procedure Changes. An interim Job Qualification Standards (JQS) has been developed. Implementation of the training has been completed for the above courses and the JQS is in progress for a ten-week Initial Mandatory Training classroom curriculum and a thoroughly revised OJT qualification standard. Attachment 2 provides a status of those actions which are complete and a new schedule for the remaining actions.

DRAWINGS

As discussed in Reference A, the RMS drawings are being upgraded to mylar. This action is approximately eighty percent complete for drawings with outstanding amendments. The remaining drawings will also be upgraded by May 30, 1990.



CONDENSER EFFLUENT RADIATION MONITOR

The condenser effluent radiation monitor has experienced moisture problems in the sampling media and recently in the radiation detector. Several modifications to the effluent radiation monitors have been installed with some success. However, moisture has again been discovered in the monitors during the recent cold weather of December, 1989. An extensive design modification has been developed to correct the moisture carryover in the radiation monitor. The implementation of this modification will be based on the availability of parts and on outage of sufficient duration. However, this modification is scheduled to be completed by April 1, 1991.

If you have any questions, please contact me.

Very truly yours,



JNB/TRB/JJN/kj

Attachment

cc: W. F. Conway
J. B. Martin
T. L. Chan
D. H. Coe
A. C. Gehr

ATTACHMENT 1

Schedule for Radiation Monitoring Group

Development and Implication

- I. Approve formation of a central Radiation Monitoring Group
Completed: September 12, 1989
- II. Staff Radiation Monitoring Group Supervisor
Completed: November 19, 1989
- III. Finalize reorganization plans for RP and Chemistry (including RMS Group)
Expected Completion Date: March 1, 1990
- IV. Employ and train contract effluent technicians
Completed: January 2, 1990
- V. Approve new Radiological Effluent Surveillance Tests
Completed: February 15, 1990
- VI. Revise procedures for Radiation Monitoring Group implementation
Expected Completion Date: March 12, 1990
- VII. Program implementation
Expected Completion Date: March 30, 1990
- VIII. Ongoing program review and improvements including continuing training for personnel involved.
No Completion Date, goal of the new group

ATTACHMENT 2

Schedule for

Radiological Training Program

Development and Implementation

- I. Implemented new Effluents/RMS classroom training courses based on existing plant procedures
Completed: October 9, 1989
- II. Issued Memorandum #052-02713-WEI specifying the interim Training Program Description (TPD) for the Effluents/RMS technicians. This TPD to remain in effect until the reorganization of the RP/Chemistry group is finalized (including new procedures)
Completed: November 2, 1989
- III. Revised initial OJT based on proposed Radiation Monitoring Group organization and responsibilities
Completed: November 2, 1989
- IV. Received approval for Effluents/RMS technician task list
Completed: November 25, 1989
- V. Began Job and Task analysis for the new Radiation Monitoring Group on December 10, 1989
Expected Completion Date: March 1, 1990
- VI. Evaluate revised procedures for training impact
Expected Completion Date: March 26, 1990
- VII. Revise on-the-job initial training material to incorporate procedure changes for new hires and non-qualified technicians
Expected Completion Date: May 7, 1990
- VIII. Implement on-the-job training (OJT) to Radiological Effluent Technicians
Expected Completion Date: May 21, 1990



ATTACHMENT 2

Schedule for

Radiological Training Program

Development and Implementation

PAGE 2

- IX. Develop a continuing training classroom presentation on procedure changes and deliver to qualified technicians

Expected Development Date: May 7, 1990

Expected Implementation Date: May 21, 1990

- X. Prepare an Effluents Group Training Program Description and complete training material development and implementation as needed for any additional training program upgrades related to establishment of a single group responsible for Effluents and Radiation Monitoring System

Expected Completion Date: March 31, 1990

