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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
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102-901674-WFC/TRB/JJN
April 20, 1990

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

Reference: Letter from R. P. Zimmerman, Director, Division of Reactor Safety and Projects to W. F. Conway, Executive Vice President Nuclear, Arizona Public Service, dated March 21, 1990

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 3
Docket No. STN 50-530 (License No. NPF-74)
Reply to Notice of Violation 50-530/90-08-02
File: 90-070-026

This letter is provided in response to the inspection conducted by Messrs. A. Johnson and W. P. Ang on January 29 through February 2, 1990 and February 12 through 16, 1990. Based upon the results of the inspection, one (1) violation of NRC requirements was identified. The violation is discussed in Appendix A of the referenced letter. A restatement of the violation and PVNGS's response are provided in Appendix A and Attachment 1, respectively, to this letter.

Should you have any questions regarding this response, please contact me.

Very truly yours,



WFC/TRB/JJN/tlg

Attachments

cc: J. B. Martin A. H. Guttermann
D. H. Coe T. L. Chan
E. E. Van Brunt A. C. Gehr

90774270114-6pp



APPENDIX A

NOTICE OF VIOLATION

Arizona Nuclear Power Project
Palo Verde Unit 3

Docket Number 50-530
License Number NPF-74

During an NRC inspection conducted January 29 - February 2, 1990 and February 12-16, 1990, one 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 (1989), the violation is listed below:

License NPF-74, Condition F, for the Palo Verde Unit 3 Nuclear Generating Station, reads in part, "APS shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report (FSAR) for the facility, as supplemented and amended, and as approved in the SER through Supplement 11 "

FSAR Table 9.5-1c., Quality Assurance, Item 8, Corrective Actions, states that "measures shall be established to assure that conditions adverse to fire protection, such as failures, malfunctions, deficiencies, deviations, defective components, uncontrolled combustible material and nonconformances are promptly identified, reported and corrected."

Contrary to the above, measures did not assure conditions adverse to fire protection were promptly corrected in that on February 14, 1990, emergency light 3EQN002-G and emergency light inverter 3EQBN004, required by License NPF-74, Condition F, had been inoperable in excess of 35 days and had not been promptly repaired or replaced.

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



ATTACHMENT 1

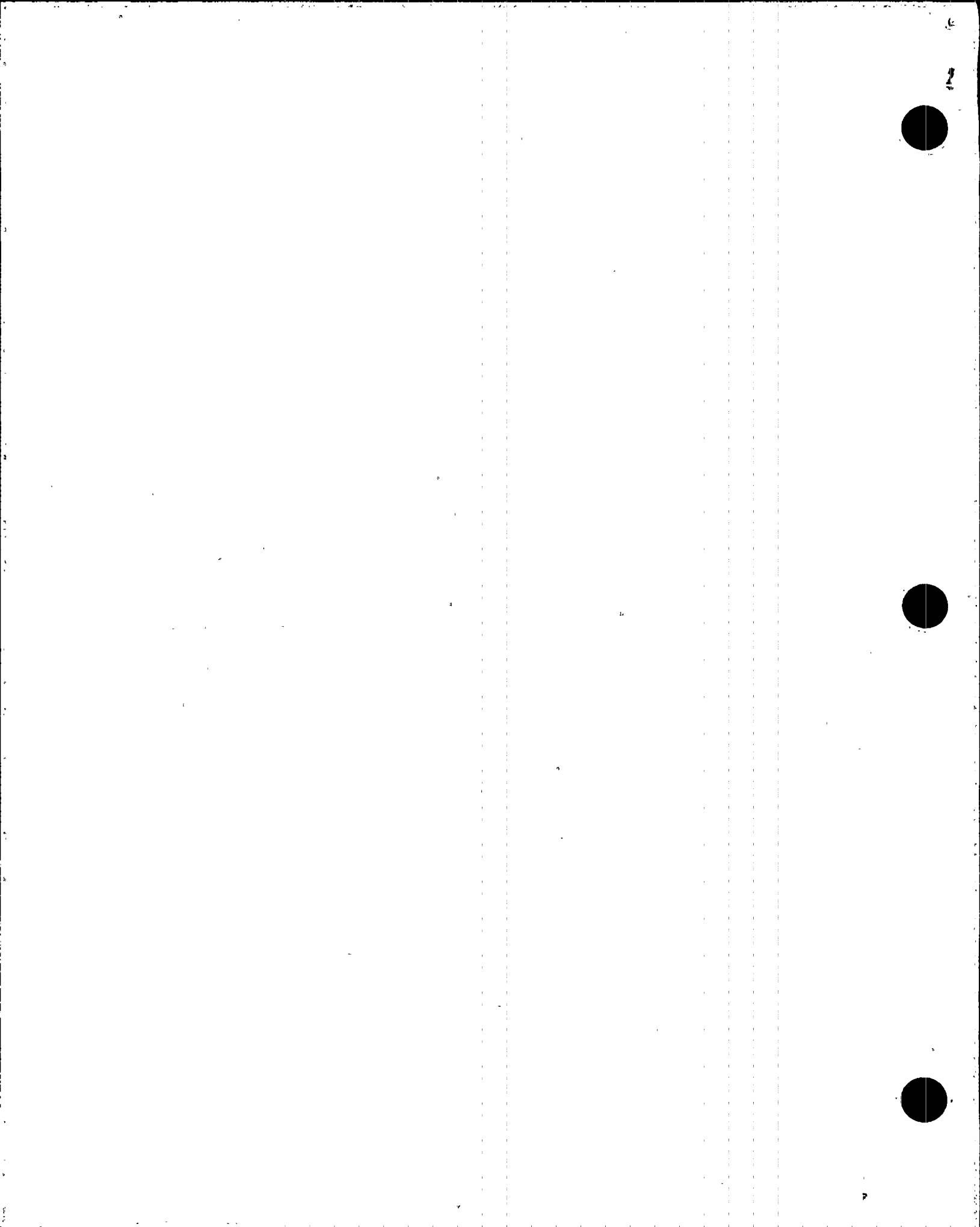
Reply to Notice of Violation 50-528/90-08-02

I. REASON FOR VIOLATION

Emergency Light 3EQBN002-G

On January 5, 1990, Work Request 382867 was initiated to replace the ballast for emergency light 3EQBN002-G. The Work Request was processed as a priority 3A (schedulable work which can be accomplished in any mode and not affect plant operation) in accordance with APS procedures. Prior to and during the time that the Work Request was being processed, emergent work was being performed to replace the "A" Phase Main Transformer and return Unit 3 to service. This work involved priority 1 Emergent Work (personnel or plant safety) and priority 2 Emergent Work (required to assure continued power production or continued unit availability). The replacement of the ballast for the Emergency light was scheduled to follow higher priority work.

APS has developed the administrative controls to provide for the general prioritization of maintenance activities. Detailed prioritization and scheduling is accomplished by plant management and Work Control direction. However, as noted below, plant management had not provided



sufficient direction to reflect the necessary priority of Emergency Lighting concerns.

Emergency Light Inverter 3EQBN004 "

On January 7, 1990, Work Request 388112 was initiated to calibrate the display board for emergency light inverter 3EQBN004. The display board was indicating that the batteries were supplying twenty to thirty percent load. However, Work Control believed the display board was out of calibration based on other indications on the inverter and their experience with minor calibration drift. APS believes this condition did not affect the operability of the inverter at this time.

On January 11, 1990, Work Order 403303 was issued to recalibrate the display board. The work order was prioritized in accordance with APS administrative controls as discussed above. Other higher priority work was already in progress which affected the scheduling of the work.

On January 31, 1990, the System Engineer walked down the Emergency Lights and noted that the load indication had increased to 80 to 90 percent. This higher load indication identified an additional problem than originally anticipated. This condition was discussed with Work Control and Maintenance personnel. On February 8, 1990, work was commenced on 3EQBN004. At this time the indication had returned to

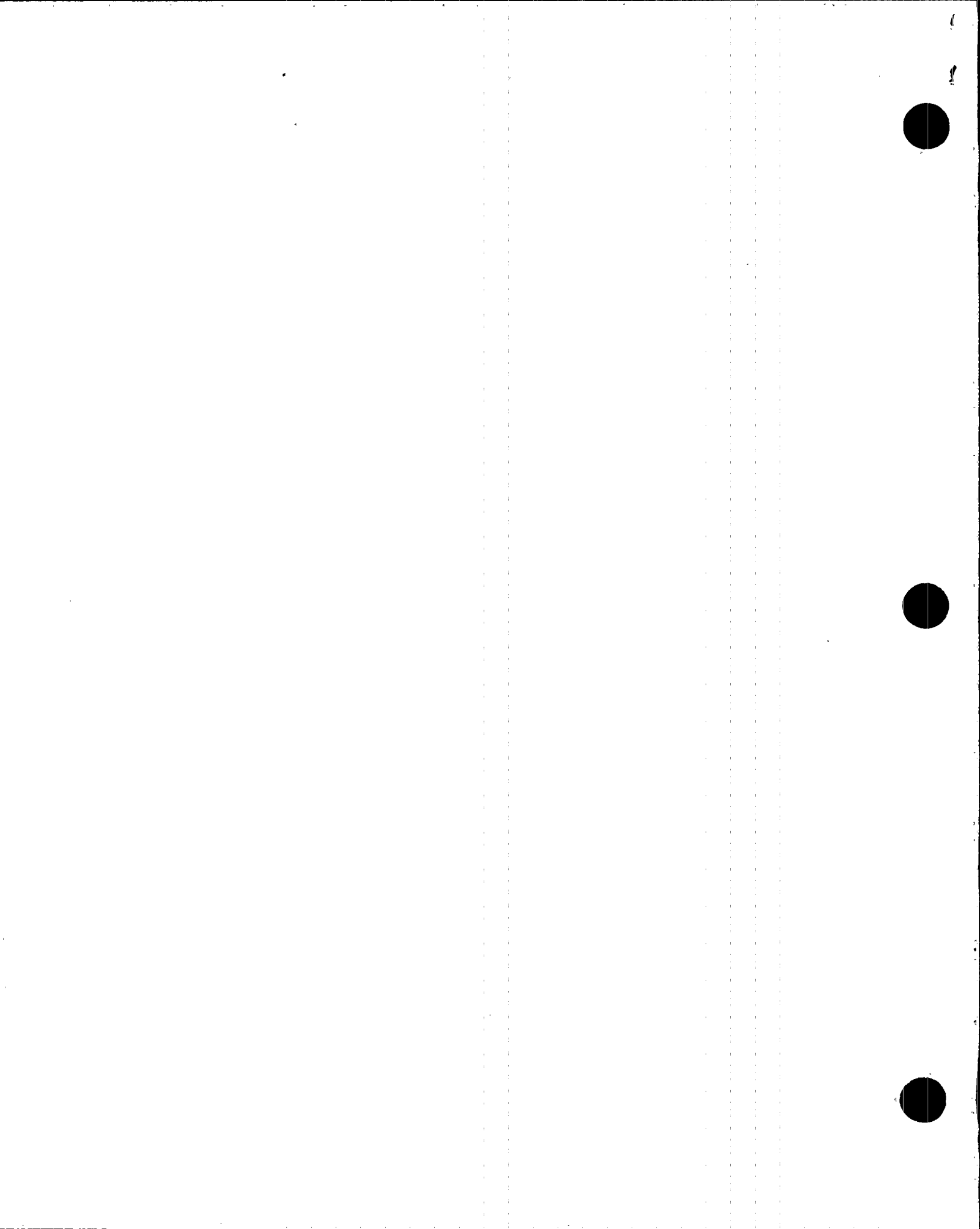


normal. This is believed to be the result of the internal isolation of one of the two redundant inverter boards. During the performance of the calibration, the failed inverter board was identified. Once the replacement inverter board was issued from the warehouse, the work was expeditiously performed, and work was completed on February 16, 1990.

The reason for the violation was that the administrative controls for the prioritization of work and subsequent scheduling did not adequately reflect APS's commitment in FSAR Table 9.5-1c., Quality Assurance, Item 8, Corrective Actions, which states that "measures shall be established to assure that conditions adverse to fire protection, such as failures, malfunctions, deficiencies, deviations, defective components, uncontrolled combustible material, and nonconformances are promptly identified, reported, and corrected."

II. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The Director of Operations and Maintenance has promulgated a plant guideline providing additional guidance regarding the prioritization of work. Corrective maintenance for the operability of Emergency lights will be treated as priority 2 (i.e., work should commence within 24 hours). This guideline will remain in effect until the scheduling process is reviewed to verify that non-production equipment is being properly prioritized.



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

APS believes the actions taken as described above are adequate to prevent recurrence.

IV. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

On February 16, 1990 work was completed on the inverter. Full compliance was achieved on February 26, 1990 when the ballast was replaced on emergency light 3EQBN002-G.



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 50-530/90-08.

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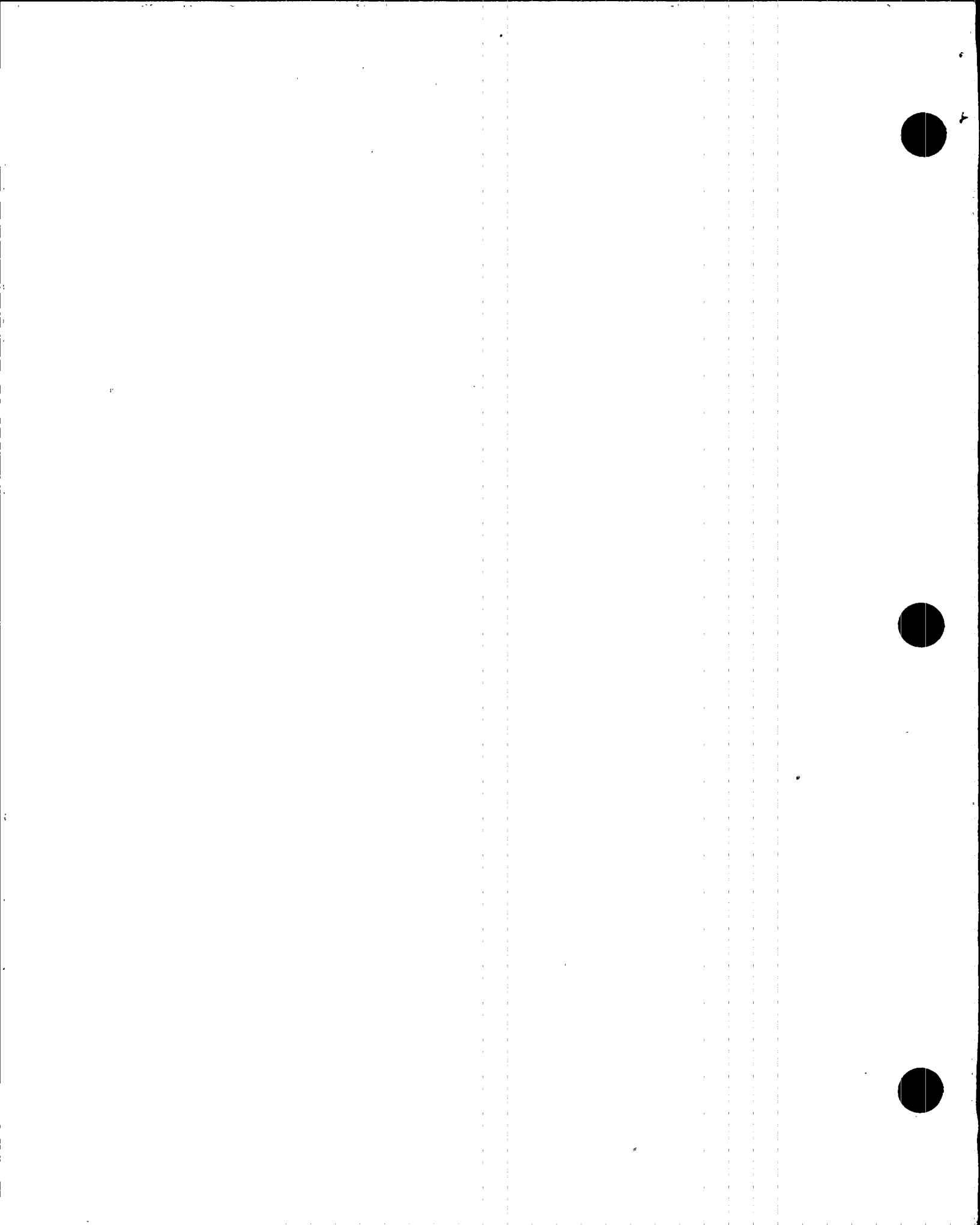
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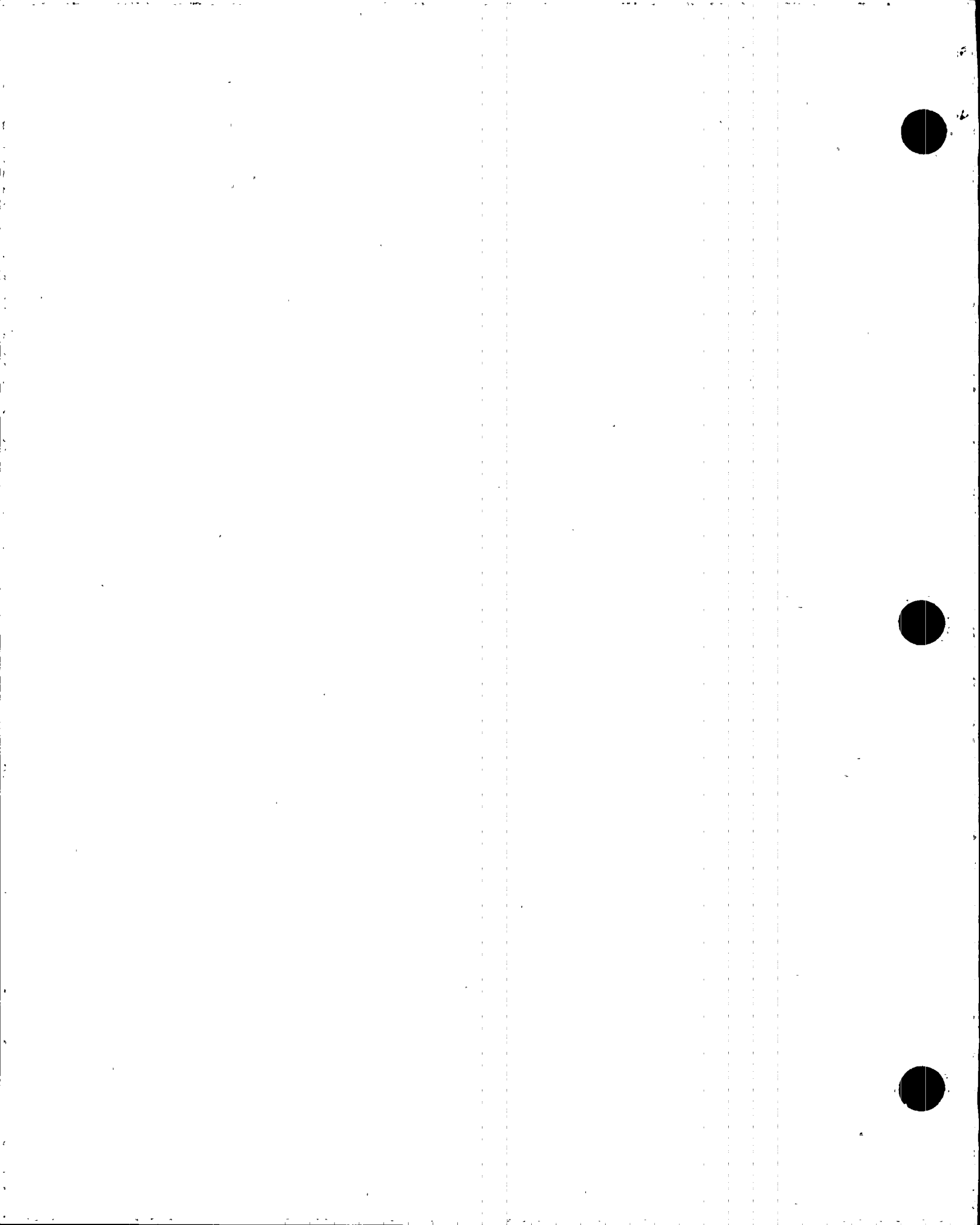
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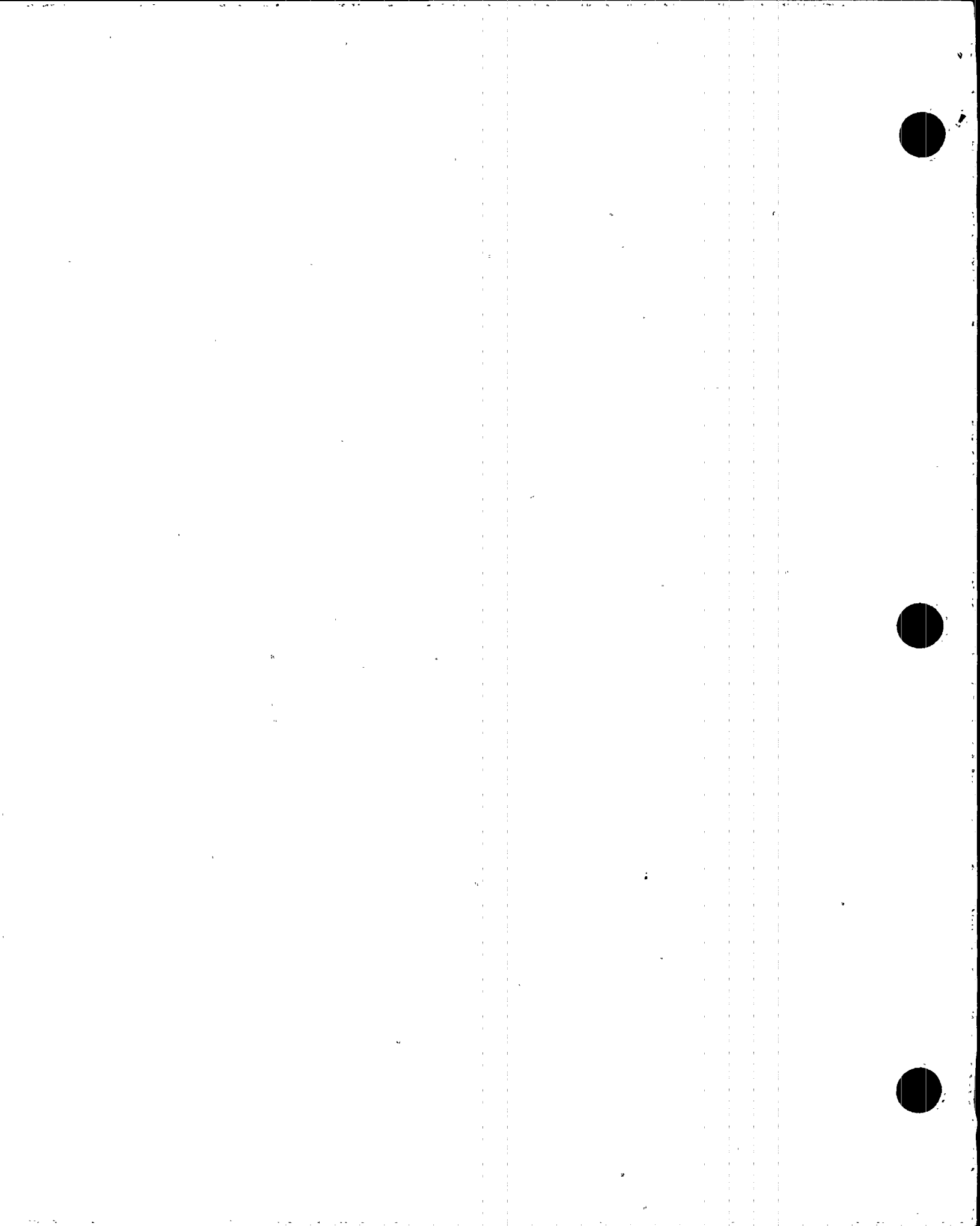
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