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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-02113-WFC/TRB/JRB
February 14, 1992

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Mail Station: P1-37
Washington, DC 20555

Reference: Letter dated January 16, 1992, from D. F. Kirsch, Chief, Reactor
Safety Branch, NRC, to W. F. Conway, Executive Vice President,
Nuclear, APS.

Gentlemen:

SUBJECT: PALO VERDE NUCLEAR GENERATING STATION (PVNGS)
UNITS 1, 2 AND 3
REPLY TO NOTICE OF VIOLATION 50-528/91-44-01
File: 92-070-026

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528, 529, 530/91-44 and the Notice of Violation dated January 16, 1992. Pursuant to the provisions of 10 CFR 2.201, APS' response is attached. Appendix A to this letter is a restatement of the Notice of Violation. APS' response is provided in Attachment 1.

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

Very truly yours,



WFC/TRB/JRB/nk
Attachments

1. Appendix A - Restatement of Notice of Violation
2. Attachment 1 - Reply to Notice of Violation

cc: J. B. Martin
D. H. Coe

920205036



APPENDIX A

RESTATEMENT OF NOTICE OF VIOLATION 50-528/91-44-01

**NRC INSPECTION CONDUCTED NOVEMBER 4, 1991 -
DECEMBER 6, 1991**

INSPECTION REPORT NOS. 50-528, 529, 530/91-44

RESTATEMENT OF NOTICE OF VIOLATION 50-528/91-44-01

During an NRC inspection during the weeks of November 4, 18, and December 2, 1991, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violation is listed below:

10 CFR Part 50. Appendix B, Criterion V, "Instructions, Procedures, and Drawings," states in part:

"Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, . . . and shall be accomplished in accordance with these instructions, procedures, or drawings"

- o Palo Verde Nuclear Administrative and Technical Manual procedure 30 DP-9MP01, Conduct of Maintenance, Section 3.5.13 states in part, "Personnel doing maintenance shall not alter, change or modify plant equipment," Limitorque Vendor Technical Document Number VTD-L200-0025, states in part, "Limitorque uses commercial grade 5 or better hardware on all operators. All external hardware is cadmium plated for corrosion resistance."

Contrary to the above, on November 19, 1991, Unit 3 valve 3JSIA-HV-306 limit switch cover plate had two bolts installed, which were not grade 5 or better nor cadmium plated.

- o Palo Verde Nuclear Administrative and Technical Manual Procedure 30 DP-9MP01, Conduct of Maintenance, Section 3.5.13 states in part, "Plant equipment shall be restored to proper design configuration including all fasteners in place,"

Contrary to the above, Unit 1 valve 1JCHB-HV-255; Unit 2 valves 2JSGA-UV-0138 and 2JCHE-HV-0536, and Unit 3 valve 3JSIA-UV-617 were missing fasteners on the limit switch cover plates.

This is a Severity Level IV Violation (Supplement I)



ATTACHMENT 1

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REPLY TO NOTICE OF VIOLATION 50-528/91-44-01

Reason for the Violation

The reason for the violation was ~~personnel error~~ by maintenance personnel in restoring certain motor operated valve limit switch covers to proper design configuration following maintenance activities. Specifically, one example of two bolts of questionable material installed in a motor operated valve limit switch cover plate and four examples of a missing fastener on limit switch cover plates on four motor operated valves were identified.

Corrective Steps That Have Been Taken and the Results Achieved

Material nonconformance reports were initiated upon identification of the four missing bolts from the four limit switch covers. The missing fastener in each limit switch cover has been replaced.

An engineering evaluation request was initiated to document the bolting being of indeterminate origin and material and to evaluate the installation of these bolts for impact on valve operability. This engineering evaluation determined that the installation of these bolts in this application has no effect on operability of the motor operated valve. Limit switch covers are installed on the limit switch compartments of Limitorque operators for



cleanliness, personnel safety, and to protect the limit switches from damage. The design incorporates several bolts with a gasket between the limit switch cover and the limit switch compartment. The equipment qualification report for Limatorque operators states; in part, that Limatorque actuators for nuclear plant application are designed to permit them to survive normal and accident conditions without depending on absolute sealing and that the seals are of no importance for qualification. The questionable bolts in the limit switch cover have been replaced.

Stupid
A condition report/disposition request was initiated to determine the root cause of failure for improperly restoring motor operator valves' limit switch covers. Previously completed work orders on the subject valve operators were reviewed to determine if any missing or questionable bolting on the limit switch covers had been documented. No missing or questionable bolting had been documented. Consequently, the investigation concluded the root cause to be personnel error:

• Maintenance personnel who perform work on motor operated valves were briefed, on the identified conditions, and the importance of proper restoration of motor operated valves was stressed.

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Corrective Steps That Will Be Taken To Avoid Further Violations

Based on similar problems recently identified by APS and NRC, APS will conduct an investigation of equipment hardware configuration to determine if there are additional causes of these issues. This investigation is expected to be completed by April 13, 1992, and subsequent corrective actions will be implemented through the APS Incident Investigation Program.

Work orders have been initiated in Units 1, 2, and 3 to walk down accessible safety related motor operated valve operators to verify covers and fasteners are properly installed. Missing or questionable fasteners will be documented and corrected.

Date When Full Compliance Will be Achieved

APS achieved full compliance on February 7, 1992, upon installation of the proper fasteners in the motor operated valves' limit switch covers identified above.



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ONWAY,W.F. Arizona Public Service Co. (formerly Arizona Nuclear Power
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 920116 ltr re violations noted in insp rept
50-528/91-44 from 911104 to 911206. Corrective actions: proper
fasteners installed in motor valves' limit switch covers as
identified as of 920207.

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