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 AUTH. NAME AUTHOR AFFILIATION
 CONWAY, W.F. Arizona Public Service Co. (formerly Arizona Nuclear Power
 RECIP. NAME RECIPIENT AFFILIATION
 MARTIN, J.B. Region 5 (Post 820201)

SUBJECT: Responds to NRC 920203 ltr re violations noted w/assurance
 that matters raised receiving top level mgt attention &
 enhanced oversight. All hands personnel briefings including
 contractor staff held. Formal response to EA-91-182 follows..

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

212-00963-WFC/RJS
February 14, 1992

Mr. John B. Martin
Regional Administrator, Region V
U. S. Nuclear Regulatory Commission
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Dear Mr. Martin:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Interim Response to February 3, 1992,
Notice of Violation for PVNGS, EA 91-182
File: 92-056-026

Arizona Public Service Company (APS) has received your letter of February 3, 1992, transmitting Enforcement Action (EA) 91-182 and associated documentation. I want to personally acknowledge that letter and to let you know that the matters raised in this correspondence are receiving my personal attention as well as that of my principal officers and staff. Our formal response, which will address not only the specific violations but also the underlying programmatic concerns identified in the cover letter and the measures being taken to assure that our corrective actions are responsive and effective over the long term, will be submitted in accordance with the requirements set forth in your letter.

In the interim, however, we are taking certain immediate actions to provide additional near-term assurance that our expectations for safe operation of PVNGS are met. These measures include:

- (1) On Friday, February 7, 1992, we initiated a series of "all hands" briefings which were attended by PVNGS personnel, corporate nuclear staff personnel, and contractor personnel. These meetings, conducted by the PVNGS Vice Presidents of Nuclear Production and Nuclear Engineering, emphasized the seriousness with which APS management views these violations, our commitment to eliminate their causes, and the need for all personnel to support this effort. My deep reservations concerning recent performance were made clear as was the fact that this performance does not meet APS management expectations and is not acceptable to us.

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- (2) I have directed enhanced management oversight of operations. Specifically, beginning February 15, 1992, the Assistant Plant Manager, the Operations Manager, and the Operations Supervisor for each unit will be placed on rotation to provide direct shift observation of the PVNGS operating crews. This rotation will be structured so that all shifts can be observed at different times, including weekends. They will have instructions as to those matters requiring especially close observation and reporting with emphasis on the adequacy of communications, command and control, and adherence to procedures. The Vice President of Nuclear Production and I will receive periodic personal briefings on these observations. This program will be continued until we are satisfied that the shift crews fully understand and are implementing management's expectations in these areas.
- (3) In connection with the upcoming outage at Unit 1, comparable measures to ensure enhanced management oversight were already planned. Key outage tasks (those of special importance or complexity) have been identified, and supervisors or management personnel (in addition to those who would normally be present to observe and help direct these tasks) have been assigned to provide management involvement and oversight. Emphasis will be placed on observations which ensure adequacy of preplanning, including establishment of contingencies and determinations of potential effects on other organizations, designation of a person in charge, proper level of supervisory/management involvement, and communications requirements. The Vice President of Nuclear Production and I will be personally briefed on the results of these observations.

Similar measures to intensify oversight of maintenance functions are also under consideration. These measures will be discussed in our formal response to EA 91-182.

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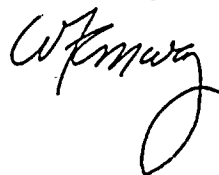
These immediate actions are being given a high priority. I will participate personally in certain observation activities as will Mr. Levine and others in senior site management. Further, I have discussed these steps with our President and Chief Executive Officer, Mr. O. Mark DeMichele, and he fully concurs.

I would like to stress that these are near-term measures aimed at promptly raising the level of awareness of the APS staff regarding the matters addressed in your letter of February 3, 1992. Measures for the intermediate and longer term are being evaluated and will be addressed in our formal response to EA 91-182.

I hope I have conveyed a sense of the importance and urgency felt by APS management in attacking these problems in a timely and effective way. We will stay in touch with your staff regarding progress in implementing the immediately effective measures I have outlined.

If you should have any questions, please contact me.

Sincerely,



WFC/RJS/rw

cc: Document Control Desk
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