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Arizona Public Service Company

P.O. BOX 53999 • PHOENIX, ARIZONA 85072-3999

WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-02136-WFC/TRB/PJC
April 11, 1992

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

Reference: Letter dated March 6, 1992, from G. P. Yuhas, Chief, Reactor Radiological Protection 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 50-528/92-02-01
File: 92-070-026

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528, 529, 530/92-02 and the Notice of Violation dated March 6, 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. During a telephone conversation on March 20, 1992, between C. A. VanDenburgh, NRC, and T. R. Bradish, APS, an extension of the due date for this response from April 5, 1992 to April 15, 1992, was granted.

Section 4 of the Inspection Report identifies a concern regarding Radiation Protection technician training and resources for properly locating air samplers. The corrective actions being taken for this violation address this concern.

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

Sincerely,



WFC/TRB/PJC/mh

Attachments

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

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

APPENDIX A

**RESTATEMENT OF NOTICE OF VIOLATION
50-528/92-02-01**

**NRC INSPECTION CONDUCTED JANUARY 13 - 17, 1992
AND FEBRUARY 3 - 7, 1992**

INSPECTION REPORT NO. 50-528, 529, 530/92-02

RESTATEMENT OF NOTICE OF VIOLATION 50-528/92-02-01

During an NRC inspection conducted January 13, 1992, to February 7, 1992, a 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, the violation is listed below:

- A. 10 CFR 20.103(a)(3) requires that each licensee use suitable measurements of concentrations of radioactive materials in air for detecting and evaluating airborne radioactivity in restricted areas.

Contrary to the above, on February 5 and 6, 1992, the licensee did not use suitable measurements of the concentrations of radioactive materials in air associated with the performance of work pursuant to Radiation Exposure Permit (REP) No. 1-92-2132-A. Specifically, smoke tests revealed that the air sampling device was not located such that it was representative of the workers' breathing zone. Subsequent measurements found that the workers had not been exposed to significant quantities of radioactive material in air.

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

ATTACHMENT 1

REPLY TO NOTICE OF VIOLATION 50-528/92-02-01

**NRC INSPECTION CONDUCTED JANUARY 13 - 17, 1992
AND FEBRUARY 3 - 7, 1992**

NRC INSPECTION REPORT NO. 50-528, 529, 530/92-02

REPLY TO NOTICE OF VIOLATION 50-528/92-02-01

Reason For The Violation

This violation was the result of a Radiation Protection (RP) technician positioning an air sampler based upon his concern for preventing possible cross-contamination of the air sample head. Because of the limited space available in the work area, the technician positioned the air sampler such that his cross-contamination concern was addressed; however, he did not adequately evaluate the impact of the selected location upon the suitability of the breathing zone air samples that would be obtained.

A review of training materials and RP procedures determined that the need to evaluate cross-contamination concerns against the requirement to take suitable measurements of concentrations of airborne radioactive materials was not addressed. A contributing factor was the lack of procedural guidance for determining air flow in an area to ensure proper placement of air sampling devices.

Corrective Steps That Have Been Taken And The Results Achieved

On February 6, 1992, an air flow smoke test was conducted in the work area (decontamination spray booth) to determine the ventilation flow and the adequacy of the air sampler location. Based upon the evaluation of the test results, the air sampler was moved to a location closer to the work area where more representative measurements of the workers' breathing zone air could be taken.

Personnel who were located in the decontamination spray booth at the time of the incident had Whole Body Count bioassays on February 6, 1992. The bioassays identified only naturally-occurring radioactivity.

On February 12, 1992, Unit 1 RP management discussed this incident with unit technicians and instructed them regarding acceptable methods for obtaining representative breathing zone air samples. Subsequent inspections of work areas by RP management have not identified any further incidents of this nature.

Corrective Steps That Will Be Taken To Avoid Further Violations

Second quarter radiation protection technician retraining will include a discussion of this incident, the requirements for breathing zone air samples, determination of ventilation flow, cross-contamination concerns, and the procedure changes. The retraining will be completed by June 12, 1992.

Procedure 75RP-9RP21, "Airborne Evaluation," will be revised to provide guidance for evaluating the need to obtain representative breathing zone air samples versus possible worker interference and the potential for cross-contamination of the air sample head, instructions regarding the steps to be taken in the event of suspected cross-contamination, and methodologies for determining air flow within an area. The procedure will be revised by June 5, 1992.

The PVNGS Radiation Protection Newsletter will feature an article on this incident including the requirements for breathing zone air samples and the corrective actions being taken. The article will be published in an April issue of the Newsletter.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on February 6, 1992, when the air sampler was relocated to a position from which it would provide representative samples of the workers' breathing zone air.

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

SUBJECT: Responds to NRC 920306 ltr re violations noted in insp rept
 50-528/92-02. Corrective actions: air flow test conducted in
 work area.

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