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 CONWAY,W.F. Arizona Public Service Co. (formerly Arizona Nuclear Power  
 RECIP.NAME RECIPIENT AFFILIATION  
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SUBJECT: Responds to NRC 930701 ltr re violations noted in insp rept  
 50-529/93-22.C/As:Jul & Sept will be utilized to train  
 Operations staff, Emergency Coordinators & Emergency  
 Directors through annual regualification process.

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102-92594-WFC/TRB/JJN

July 30, 1993

WILLIAM F. CONWAY  
EXECUTIVE VICE PRESIDENT  
NUCLEAR

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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Reference: Letter dated July 1, 1993, from Ross A. Scarano, Director, Division of Radiation Safety and Safeguards, NRC, to W. F. Conway, Executive Vice President, Nuclear, APS

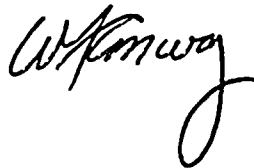
Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Unit 2  
Docket Nos. STN 50-529  
Notices of Violation 50-529/93-22-01, 529/93-22-05,  
529/93-22-06, and 529/93-22-07  
File: 93-070-026

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-529/93-28, and the Notice of Violations, dated July 1, 1993. Pursuant to the provisions of 10 CFR 2.201, APS' responses are enclosed. Enclosure 1 to this letter is a restatement of the Notices of Violation. APS' responses are provided in Enclosure 2.

Should you have any questions, please call Thomas R. Bradish at (602) 393-5421.

Sincerely,



WFC/TRB/JJN/rv

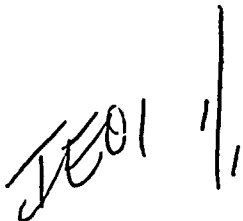
Enclosures:

1. Enclosure 1 - Restatement of the Notices of Violation
2. Enclosure 2 - Reply to the Notices of Violation

cc: B. H. Faulkenberry  
J. A. Sloan

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Notice of Violation 50-528/93-05-03  
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**ENCLOSURE 1**

**RESTATEMENT OF NOTICES OF VIOLATION**

**50-529/93-22-01, 50-529/93-22-05, 50-529/93-22-06, and  
50-529/93-22-07**

**NRC INSPECTION CONDUCTED**

**APRIL 26-30, 1993 AND MAY 11-14, 1993**

**INSPECTION REPORT NO. 50-529/93-28**





**Restatement of Notices of Violation 50-529/93-22-01, 50-529/93-22-05,  
50-529/93-22-06, and 50-529/93-22-07**

During an NRC inspection conducted on April 26-May 5 and May 11-14, 1993, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

Technical Specification 6.8.1 requires in part that written procedures be established, implemented and maintained covering "Emergency Plan implementation."

- A. Emergency Plan Implementation Procedure, EPIP-02, Revision 09.00, Event Classification, Appendix A, Table 1 requires that an event involving reactor coolant system (RCS) leakage that is both greater than 44 gpm and greater than charging pump capacity be classified as a Site Area Emergency. EPIP-02 further requires that a post-reactor trip event be classified based not only on the plant conditions that are currently in progress, but also on those which have already occurred.

Contrary to the above, on March 14, 1993, a steam generator tube rupture (SGTR) event involving RCS leakage greater than charging pump capacity, was not classified as a Site Area Emergency.

This is a Severity Level IV Violation (Supplement VIII).

- B. Emergency Plan Implementation Procedure, EPIP-20, Revision 10.04, Personnel Assembly and Accountability, requires that assembly and accountability be accomplished within 30 minutes of its request by the Emergency Coordinator, and that the Security Director provide to the Emergency Coordinator within 30 minutes of his request, a list by name of unaccounted personnel in the protected area.

Contrary to the above, on March 14, 1993, the licensee took 6 hours and 44 minutes after the declaration of accountability to accomplish the required assembly and accountability and to provide a list by name of the unaccounted personnel in the protected area.

This is a Severity Level IV Violation (Supplement VIII).

- C. Emergency Plan Implementation Procedure, EPIP-20, Revision 10.04, Personnel Assembly and Accountability, requires the Security Director to check trailers and buildings in the Owner Controlled Area, outside the Protected Area, for unaccounted personnel after the Emergency Coordinator requests assembly and accountability.

Contrary to the above, on March 14, 1993, the Security Director did not check trailers and buildings in the Owner Controlled Area, outside the Protected Area, for



unaccounted personnel after the Emergency Coordinator had requested assembly and accountability.

This is a Severity Level IV Violation (Supplement VIII).

- D. Emergency Plan, Section 6.6.1.3, Security Access and Control, prohibits entry of nonessential personnel into the Protected Area (PA) after assembly and accountability has been requested by the Emergency Coordinator.

Contrary to the above, on March 14, 1993, nonessential personnel entered the PA after assembly and accountability had been requested by the Emergency Coordinator.

This is a Severity Level IV Violation (Supplement VIII).



**ENCLOSURE 2**

**REPLY TO NOTICES OF VIOLATION**

**50-529/93-22-01, 50-529/93-22-05, 50-529/93-22-06, and  
50-529/93-22-07**

**NRC INSPECTION CONDUCTED**

**APRIL 26-30, 1993 AND MAY 11-14, 1993**

**INSPECTION REPORT NO. 50-529/93-28**



## Reply to Notice of Violation 50-529/93-22-01

### Reason For The Violation

The reason for the violation was that the Emergency Coordinator (EC) misapplied the requirements of the Emergency Operating Procedures (EOPs) with the Emergency Plan Implementing Procedures (EPIPs) for diagnosing time dependent variables. The EOP diagnostic methodology uses a "snapshot" approach. Current plant conditions are evaluated to the applicable criteria. EPIP 02, "Emergency Classification" uses a historical approach. Current and prior plant conditions are evaluated to the applicable criteria to determine the appropriate emergency classification.

On March 14, 1993, following the reactor trip and initial classification (Notification of an Unusual Event based on a valid Safety Injection Actuation Signal - SIAS), the EC classified the event as an Alert. This classification was based on the Reactor Coolant System (RCS) leakage greater than 44 gpm (the capacity of a charging pump). At this time, pressurizer pressure and level, and RCS temperature had stabilized such that the leakage rate appeared to be within the capacity of the charging pumps. Based only on these indications, the appropriate classification should have been an Alert. However, at the time of the event, EPIP 02 required an evaluation of plant conditions that are in progress, or have occurred, for determining the Emergency Action Level (EAL). The EC did not apply





the EAL criteria to past plant indications/conditions. As a result, the event was not classified as a Site Area Emergency (SAE) as required by procedure.

During the recovery from the event, PVNGS engineering and management personnel reviewed plant data immediately prior to and after the trip, and determined that RCS leakage was probably in excess of available charging pump capacity. Following a review of EPIP-02 and discussion with plant management, PVNGS personnel notified NRC personnel that for some period PVNGS should have been in a SAE based on EPIP-02. Subsequent engineering calculations have determined that the leakage rate was in excess of charging pump capacity and that the High Pressure Safety Injection (HPSI) pump was also providing some makeup to the RCS following the SIAS. The HPSI flow rate was so low (less than 65 gpm) that the control room indicators would likely read zero.

#### **Corrective Steps That Have Been Taken And Results Achieved**

EPIP-02 revision 9.02 was implemented effective June 30, 1993, providing steps that nominally lead to classifying a Steam Generator Tube Rupture as an Alert. A complete rewrite of EPIP-02 (revision 10) was approved on July 19, 1993, with an effective implementation date scheduled for September 4, 1993. The time between July and September will be utilized to train Operations staff, Emergency Coordinators, and Emergency Directors through the annual requalification process. Revision 10 simplifies



the classification process and provides the ECs with further direction regarding an event where conditions are currently at a lower classification level than previously existed.

Training was provided to the ECs emphasizing the differences between the use of EOPs and EPIP-02.

#### **Corrective Steps That Will Be Taken to Avoid Further Violations**

The corrective steps taken above are expected to avoid further violations.

#### **Date When Full Compliance Will Be Achieved**

Full compliance was achieved on March 15, 1993, when plant conditions no longer met EPIP-02 requirements for a Site Area Emergency.



## Reply to Notice of Violation 50-529/93-22-05

### Reason For The Violation

The reason for the violation was the lack of practical full participation drills. The individuals responsible for performing the accountability were not sufficiently familiar with the process to ensure that a detailed report, listing the names of plant personnel who were either not authorized or were not in appropriate assembly locations, was provided to the EC. Additionally, the individuals responsible for providing the list did not reference the applicable EPIP. A contributing cause to the violation was that site personnel were not sensitive to the needs of timely assembly/accountability which further hindered the accountability process.

### Corrective Steps That Have Been Taken And Results Achieved

Unannounced drills have been conducted on both backshift and dayshift. These drills were successfully completed on May 19 and 26, 1993. Future drills are currently scheduled annually as a minimum. This frequency may be adjusted based on demonstrated performance.



Security personnel conducted drills on shift and each Security Shift Supervisor provided on-the-job-training for members of the security force.

The individuals who were responsible for providing the accountability list to the EC on March 14, 1993, were counseled regarding the requirement to follow procedure.

To ensure plant personnel understood the importance of assembly/accountability and management's expectation, several notifications were made and meetings were held. On March 22, 1993, a safety newsletter was issued to PVNGS personnel restating the importance to individual safety of being familiar with the assembly and accountability process. During the week of April 19, 1993, briefings were conducted at the plant status meeting with unit management. On May 10, 1993, a sitewide safety stand-down was conducted to review assembly and accountability procedures. On May 17, 1993, a memorandum from the Vice-President, Nuclear Production, was issued to managers and supervisors restating their responsibility to ensure that their employees know what actions to take during an assembly and accountability.

#### **Corrective Steps That Will Be Taken to Avoid Further Violations**

Security Training has developed draft lesson plans for the specific security personnel duties required by the Emergency Plan. Training personnel are currently evaluating





different methodologies (e.g., classroom, on-shift, computer based, etc) to provide the instruction. APS expects to complete this evaluation by November 1, 1993.

**Date When Full Compliance Will Be Achieved**

Full compliance was achieved on March 14, 1993, when a list by name was provided to the EC of individuals not accounted for in the protected area.



**Reply to Notice of Violation 50-529/93-22-06**

**Reason For The Violation**

The reason for the violation was that neither the initial nor the relief Security Director instructed security personnel to initiate a sweep of the owner controlled area. EPIP 20 requires that the Security Director initiate the sweep for assembly/accountability. Neither Security Director complied with the procedural requirement to initiate the sweep nor did the relief Security Director verify that the sweep had commenced.

**Corrective Steps That Have Been Taken And Results Achieved**

Appropriate security personnel have been retrained regarding their responsibilities as Security Director including the requirement to initiate sweeps of the owner controlled area. Drills have been conducted to simulate site evacuation, Technical Support Center activation, Security Headquarters lockdown, and road blocks.

The individuals who were responsible for initiating the sweep of the protected area on March 14, 1993, were counseled regarding the requirement to follow procedure.



### **Corrective Steps That Will Be Taken to Avoid Further Violations**

Security Training has developed draft lesson plans for the specific security personnel duties required by the Emergency Plan. Training personnel are currently evaluating different methodologies (e.g., classroom, on-shift, computer based, etc.) to provide the instruction. APS expects to complete this evaluation by November 1, 1993.

### **Date When Full Compliance Will Be Achieved**

Full compliance was achieved on March 14, 1993, when assembly/accountability was no longer required.



**Reply to Notice of Violation 50-529/93-22-07**

**Reason For The Violation**

The reason for the violation was that EPIP 20 did not completely implement the requirements of the Emergency Plan. The Emergency Plan prohibits entry into the protected area to nonessential personnel, whereas, the EPIP restricts only visitors from entering into the protected area. As a result, a nonessential person was permitted entry into the protected area following the EC's request for assembly and accountability.

**Corrective Steps That Have Been Taken And Results Achieved**

EPIP 20 has been revised to require a lockdown of the protected area except for essential or properly authorized personnel.

As discussed above, security personnel have conducted drills simulating lockdowns of the protected area, manning road blocks, and controlling facility access.





### **Corrective Steps That Will Be Taken to Avoid Further Violations**

The EIPs are being reviewed to ensure the requirements of the Emergency Plan are incorporated. This is expected to be completed by September 7, 1993.

### **Date When Full Compliance Will Be Achieved**

Full compliance was achieved on May 7, 1993, when EIPs 20 and 24 were revised.

