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RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 950117 ltr re violations noted in insp rept
50-529/94-34. Corrective actions: security patrol instructed
to report open Salt River Project switchyard gates if
encountered during shiftly patrols.

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WILLIAM L. STEWART
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-03251-WLS/AKK/RAS
February 16, 1995

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Reply to Notice of Deviation 50-529/94-34-02
File: 95-070-026

Arizona Public Service Company (APS) has reviewed the NRC Inspection Report 50-528/529/530/94-34 and Notice of Deviation (NOD) dated January 17, 1995. Pursuant to the provisions of 10CFR 2.201, APS' response is provided in Enclosure 2. Enclosure 1 to this letter is a restatement of the NOD.

The Unit 2 battery compensatory actions were taken to ensure, that if called upon, the batteries could perform their safety related function which has been demonstrated by successful control group testing. Other compensatory actions which were taken to limit the potential need to use the batteries were not fully met, which was identified by the NOD. Overall, the compensatory actions have been effective in ensuring no challenges to the Unit 2 batteries occurred. All batteries will be replaced during the current Unit 2 outage.

Should you have any further questions, please contact Ms. Angela K. Krainik at (602) 393-5421.

Sincerely,

E. C. Simpson
for W.L. Stewart

WLS/AKK/RAS/pv

Enclosures

1. Restatement of Notice of Deviation
2. Reply to Notice of Deviation

cc: L. J. Callan
B. E. Holian
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PDR ADCK 05000529
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ENCLOSURE 1

RESTATEMENT OF NOTICE OF DEVIATION 50-529/94-34-02
NRC INSPECTION CONDUCTED OCTOBER 16, 1994 THROUGH
NOVEMBER 30, 1994
INSPECTION REPORT Nos. 50-528/529/530/94-34

Restatement of Notice of Violations 50-529/94-34-02

During an NRC inspection conducted on October 16 through November 30, 1994, a deviation was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C, the deviation is listed below:

In a letter to the NRC dated October 12, 1994, the licensee made the following commitments to support a Technical Specification amendment, dated October 13, 1994, concerning changes to surveillance requirements for the Unit 2 125-Vdc vital batteries:

- Probabilistic Risk Assessment would be used to review all 125-Vdc system and related auxiliaries corrective/preventative maintenance work.
- Access to the switchyard would be limited. All emergent switchyard work would be reviewed by the Unit 1 Shift Supervisor.

Contrary to the above:

1. On October 18, 1994, the licensee initiated construction of scaffolding in two Unit 2 125-Vdc equipment rooms for fire penetration seal work and did not use PRA to review the maintenance work.
2. On October 26, 1994, an electrician performed work on a lamp socket powered by the 125-Vdc system and PRA was not used to review the work. During the work, the lamp socket shorted to ground.
3. On October 20, 1994, access to the switchyard was not limited in that a gate to the yard was open and not locked and there were no personnel otherwise controlling access.



ENCLOSURE 2

REPLY TO THE NOTICE OF DEVIATION 50-529/94-34-02
NRC INSPECTION CONDUCTED OCTOBER 16, 1994 THROUGH
NOVEMBER 30, 1994
INSPECTION REPORT Nos. 50-528/529/530/94-34



Reason for the Deviation

Scaffolding in 125-Vdc equipment rooms

On October 18, 1994, APS personnel began erecting scaffolding to support penetration seal work in two Unit 2 125-Vdc equipment rooms. On October 25, the shift technical advisor (STA) was in the work area and identified that the work had not been evaluated by the Probability/Risk Assessment (PRA) department. The work was suspended until a PRA review could be performed.

The work order descriptions did not clearly identify the potential impact to the surrounding 125-Vdc equipment; however, it was the expectation that PRA would review work of this type for risk assessment. In this case, the work control process failed to identify the work as requiring a PRA review.

Work on control board lamp without PRA review

On October 26, 1994, during a retest of a Unit 2 essential chilled water system circuit breaker, a control room operator noted that a green indicating lamp did not work. The indicating lamp's socket had separated from its mounting receptacle, falling behind the control board. While attempting to re-insert the socket into the control board receptacle, a ground alarm occurred on the 125-Vdc system, and the technician performing the activity was instructed to insulate the lamp receptacle. Once the socket was insulated, the ground was cleared and the alarm was reset.

A work request was generated and the 125-Vdc supply was removed from the associated breaker cubicle. The lamp socket was removed from the control board, reassembled, and then reinstalled in the control board. The lamp was then re-energized and satisfactorily completed retesting.

An evaluation of the event revealed that the activity of replacing the lamp socket does not require a formal work order. The activity of replacing the lamp socket can be performed without tools and is considered to be within the skill of the craft. The subsequent activity to repair the lamp socket did require the use of a work order and was reviewed by the PRA department. The evaluation also revealed that in the past, control room operators performed the lamp replacement, and it is only recently that maintenance technicians have performed the activity.

Switchyard Gate Left Open

On October 20, 1994, NRC personnel observed that a gate leading to the site switchyard was open. The gate was to the main switchyard, which is controlled by the Salt River Project (SRP) electric utility, and is outside the protected area. There did not appear to be anyone working in the switchyard at the time. The NRC person notified site security and the gate was secured.

APS personnel contacted SRP and was informed the gate was not normally used for access to the switchyard and was probably left open by SRP technicians. An

evaluation of the event revealed that APS had notified SRP of the increased sensitivity to switchyard activities.

Corrective Actions Taken and Results Achieved

Condition Report/Disposition Request (CRDR) 240393 was initiated by the STA to document the scaffolding condition and develop the necessary corrective actions. Subsequent work in the area was suspended until a risk assessment was completed. The risk assessment revealed that the work had a low risk impact on equipment in the DC equipment rooms.

CRDR 240395 was initiated to document the control board lamp replacement and develop the necessary corrective actions. The PRA department was notified by the Unit 2 Shift Supervisor, and a risk assessment was performed which determined the risk significance of the event to be low, based on the short duration of the ground and based on the ungrounded (floating system) design of the 125-Vdc systems.

APS held a meeting with SRP personnel on November 18 and November 30, 1994, to discuss APS/SRP communications involving day-to-day operations of the switchyard, as well as other Unit 2 125-Vdc compensatory measures. Additionally, APS Security patrols have been instructed to report open SRP switchyard gates if encountered during shiftly patrols.

Corrective Actions That Will Be Taken to Avoid Further Deviations

For the scaffolding and control board lamp replacement, guidelines have been developed which provide specific direction regarding the commitment for review of work activities as a compensatory action. These guidelines will be used by the work scheduling staff to ensure that work having the potential to impact the 125-Vdc system and the related auxiliaries will be reviewed by the PRA department. These actions are intended to provide restrictions on work activities that may potentially impact the 125-Vdc system or off-site power.

A Palo Verde single point of contact is being established to interface with SRP for scheduled and routine issues. The switchyard administrative controls procedures will be revised to ensure future communications are appropriately made, when plant conditions warrant greater switchyard control.

Date When Corrective Actions Will Be Completed

This corrective actions to establish an SRP interface and revise switchyard procedures will be completed by February 28, 1995. All other corrective actions have been completed and will remain in effect until the expiration of the Unit 2 TS amendment.

