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SUBJECT: Forwards response to NRC 950410 ltr re violations noted in insp repts 50-528/95-07-01,50-529/95-07-01 & 50-530/95-07-01 on 950306-10.Corrective actions:surveyed area & posted as high contamination area.

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10CFR2.201

Arizona Public Service Company

102-03335-WLS/AKK/RJH
April 27, 1995

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

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 Violation 50-528/529/530/95-07-01

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/95-07 and the Notice of Violation (NOV) dated April 10, 1995. Pursuant to the provisions of 10 CFR 2.201, APS' response is enclosed. Enclosure 1 to this letter is a restatement of the NOV. APS' response is provided in Enclosure 2.

This NRC inspection focused on radiation protection activities associated with the Unit 2 Refueling Outage. The NRC inspectors noted that the APS Radiation Protection program was satisfactory overall to support outage related activities and noted improvements in establishment of more challenging ALARA goals and more detailed pre-job briefings. However, a need exists for additional improvement in radioactive material and contamination control. As stated by the NRC, although general housekeeping was adequate, improvements are necessary in staging and control of outage equipment and tools. Minor problems were observed in the control of trash and extra protective clothing items. The inspectors concluded that this area of the program needs additional attention and that Radiation Protection Technicians should be more aggressive in their efforts to identify problems.

In an effort to improve radioactive material control, Radiation Protection and Maintenance Management are forming a group to address contaminated tool issues. The current guidelines are under evaluation to include necessary enhancements identified by the Palo Verde corrective action program. Radiation Protection Management has increased monitoring of this area to ensure improvements are effective.

IE01

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

Sincerely,

James M' Levine for WLS

WLS/AKK/RJH/pv

Enclosures:
1. Restatement of Notice of Violation
2. Reply to Notice of Violation

cc: L. J. Callan
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ENCLOSURE 1

RESTATEMENT OF NOTICE OF VIOLATION 50-529/95-07-01

NRC INSPECTION CONDUCTED

MARCH 6 THROUGH MARCH 10, 1995

INSPECTION REPORT NOs. 50-528/529/530/95-07

Restatement of Notice of Violation 50-529/95-07-01

During an NRC inspection conducted on March 6 through March 10, 1995, 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, the violation is listed below:

> Section 6.8.1 of the Palo Verde, Unit 2, Technical Specifications states in part, that written procedures shall be established, implemented, and maintained covering the activities referenced in Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, Section 7.e.(4) of Regulatory Guide 1.33 references contamination control.
>
> Palo Verde Radiation Protection procedure 75RP-ORP01, "Radiological Posting," Revision 7, Section 3.5, requires that areas identified as having contamination levels greater than 100,000 disintegrations per minute per 100 square centimeters be posted with radiation warning sign(s) bearing the words: "Caution or Danger, High Contamination Area." Where practical, radiological hazard tape should be used to further define area boundaries.
>
> Contrary to the above, on March 8, 1995, the inspectors identified an unposted area on the 80-foot elevation of the Unit 2 containment building where contamination levels were as high as 150,000 disintegrations per minute per 100 square centimeters.
>
> This is a Severity Level IV violation, applicable to Unit 2 (Supplement IV) (529/95-07-01).

ENCLOSURE 2

REPLY TO NOTICE OF VIOLATION 50-529/95-07-01

NRC INSPECTION CONDUCTED MARCH 6 THROUGH

MARCH 10, 1995

INSPECTION REPORT NOs. 50-528/529/530/95-07

Reply to Notice of Violation 50-529/95-07-01

Reason for the Violation

APS admits the violation.

At the time of the inspection, Unit 2 was in a refueling outage, where ASME XI testing was performed on Safety Injection System valve 2JSIB-UV332, and the valve was returned to an operable condition. The Radiation Protection Department performed the required weekly survey of the 80-foot containment which was posted as a contaminated area on March 3, 1995, at approximately 11:30 hours and found no leaks or high contamination levels in the general area of valve 2JSIB-UV332. On March 7, 1995, at approximately 16:22 hours the Shutdown Cooling (SDC) "B" train was placed in operation. On March 8, 1995, at approximately 16:00 hours the NRC inspector observed water leaking from valve 2JSIB-UV332, and subsequent survey results indicated that this was a high contamination area. The previous contamination survey performed on March 3, 1995, did not indicate any leaks on or around the area of valve 2JSIB-UV332. Additional surveys were performed on March 6th and 7th, 1995, by the Radiation Protection Operations Manager to verify a "Hot Spot" dose rate in close proximity to valve 2JSIB-UV332, and no leakage was identified during these surveys. Therefore, it is concluded that the valve leak occurred at the approximate time the SDC train "B" was placed in service. The duration that this condition existed fell between the time that the SDC train "B" was placed in service on March 7, 1995, at 16:22 hours until the condition was identified on March 8, 1995, at 16:00 hours, approximately 24 hours.

Radiation Protection Technicians missed an opportunity to identify the condition during routine Containment walkdowns which are conducted on a shiftly basis. The cause of this condition has been determined to be that management expectations were not met by "roving" Containment Radiation Protection Technicians to ensure that routine surveys provide the level of detail and are comprehensive in identifying changing plant conditions. Although Radiation Technicians typically tour all major elevations of Containment including the 80-foot elevation, no documentation existed to determine whether this particular area had been checked or toured on a shiftly basis during the time the valve was leaking.

Corrective Actions Taken and Results Achieved

APS Radiation Protection initiated the following actions to immediately correct the condition:

- The area was surveyed and posted as a High Contamination Area (HCA).
- A drip catch was installed under the valve to contain the leakage until the valve was repaired.
- The area was decontaminated and released from HCA controls.
- Work request No. 887461 was generated to repair the valve.
- All elevations of the Unit 2 Containment (including grating) were surveyed for loose contamination. No other unposted areas were discovered that required HCA controls.

- Night Order #95-003 was generated to immediately to communicate Radiation Protection Management's expectations regarding "Roving" Radiation Protection duties in Containment. The Radiation Protection Operations staff was briefed by management on March 9, 1995, regarding these expectations.

Corrective Actions That Will Be Taken To Avoid Further Violations

APS will implement the following actions to prevent recurrence:

- Night Order #95-003 was revised on April 21, 1995, to provide further clarification on management expectations for performing routine surveys, performing tours/inspections of plant areas, and personal accountability. The Radiation Protection Operations Department Leader distributed these expectations to each member of the Radiation Protection staff on April 21, 1995.
- This condition will be reviewed in Industry Events Training as part of the second quarter Radiation Protection Technician Continuing Training Program. As part of the review, Radiation Protection Management will re-enforce expectations for the "level of detail" and comprehensiveness that is expected when performing routine surveys and conducting shiftly tours or "roving" checks of plant areas.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 8, 1995, when the area was surveyed and posted as a HCA. The area was decontaminated and released from HCA controls on March 9, 1995.