

PRIORITY 1
(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SESSION NBR:9506020226 DOC.DATE: 95/05/24 NOTARIZED: NO DOCKET #
FACIL:STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
AUTH.NAME AUTHOR AFFILIATION
STEWART,W.L. Arizona Public Service Co. (formerly Arizona Nuclear Power
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 950425 ltr re violations noted in insp rept
50-529/95-08 on 950310.Corrective actions:not needed.

DISTRIBUTION CODE: IE01D COPIES RECEIVED:LTTR 1 ENCL 1 SIZE: 10
TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:Standardized plant.

05000529

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD4-2 PD	1 1	HOLIAN, B	1 1
	TRAN, L	1 1		
INTERNAL:	ACRS	2 2	AEOD/DEIB	1 1
	AEOD/SPD/RAB	1 1	AEOD/TTC	1 1
	DEDRO	1 1	FILE CENTER	1 1
	NRR/DISP/PIPB	1 1	NRR/DORS/OEAB	1 1
	NRR/DRCH/HHFB	1 1	NUDOCS-ABSTRACT	1 1
	OE DIR	1 1	OGC/HDS2	1 1
	RGN4 FILE 01	1 1		
EXTERNAL:	LITCO BRYCE, J H	1 1	NOAC	1 1
	NRC PDR	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL
DESK, ROOM P1-37 (EXT. 504-2083) TO ELIMINATE YOUR NAME FROM
DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 20 ENCL 20

P
R
I
O
R
I
T
Y

1

D
O
C
U
M
E
N
T



Arizona Public Service Company
P.O. BOX 53999 • PHOENIX, ARIZONA 85072-3999

WILLIAM L. STEWART
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-03366-WLS/AKK/DLK
May 24, 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)
Unit 2
Docket No. STN 50-529
Reply to Notice of Violation 50-529/95-08-01

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/95-08 and the Notice of Violation (NOV) dated April 25, 1995.

APS recognizes the importance of thoroughly and critically evaluating industry experience and effectively implementing any necessary corrective actions. APS' past performance in this area has been less than adequate; however, recent significant actions have been taken to upgrade the industry experience review process and Corrective Action Program. The results to date have been positive and encouraging.

APS appreciates the opportunity afforded by your staff to complete our internal investigation prior to commissioning the NRC Special Inspection.

Pursuant to the provisions of 10CFR2.201, APS' response is enclosed. Enclosure 1 to this letter is a restatement of the NOV. APS' response is provided in Enclosure 2.

020017

9506020226 950524
PDR ADDCK 05000529
Q PDR

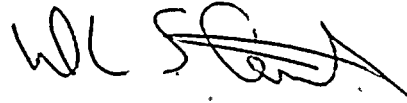
JED 11



U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Reply to Notice of Violation 50-529/95-08-01
Page 2

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

Sincerely,

A handwritten signature in black ink, appearing to be 'WLS' followed by a stylized flourish or signature mark.

WLS/AKK/DLK/pv

Enclosures:

1. Restatement of the Notice of Violation
2. Reply to the Notice of Violation

cc: L. J. Callan
B. E. Holian
K. E. Johnston
K. E. Perkins



ENCLOSURE 1

RESTATEMENT OF NOTICE OF VIOLATION 50-529/95-08-01,

NRC INSPECTION CONDUCTED MARCH 6 THROUGH

MARCH 10, 1995

INSPECTION REPORT Nos. 50-528/529/530/95-08



Restatement of Notice of Violation 50-529/95-08-01

During an NRC inspection conducted on March 6-10, 1995, one 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 Part 50, Appendix B, Criterion XVI, requires, in part, that measures be established to ensure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Contrary to the above, as of February 17, 1995, the existence of startup strainers in the suction piping of the Unit 2 containment spray pumps, a condition that did not conform to the design configuration of the plant, were not promptly identified and corrected.

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

ENCLOSURE 2

REPLY TO NOTICE OF VIOLATION 50-529/95-08-01

**NRC INSPECTION CONDUCTED MARCH 6 THROUGH
MARCH 10, 1995**

INSPECTION REPORT Nos. 50-528/529/530/95-08



REPLY TO NOTICE OF VIOLATION 50-529/95-08-01

Reason for Violation

On February 17, 1995, Palo Verde Unit 2 was performing maintenance activities on the Containment Spray (CS) system when an original startup strainer was found in the train "B" CS pump suction piping. Upon further investigation, another original startup strainer was found in the train "A" CS pump suction piping. The configuration of the CS system with startup strainers installed did not conform with the approved plant design. At the time of discovery, Unit 2 was defueled for a refueling outage, and the CS system was not required to be operable.

The startup strainers were originally installed to clean and maintain system cleanliness during post-construction startup activities and should have been removed prior to system turnover to Operations. The CS system was turned over from Startup to Operations in July 1985, with the startup strainers installed. Since July 1985, at least three separate occasions provided Arizona Public Service Company (APS) opportunities to recognize and correct the nonconforming condition. On each occasion, the installed CS startup strainers went unrecognized and were not removed.

APS performed a Significant Condition Investigation to determine why the strainers were not removed following startup activities and why APS failed to identify and correct the nonconforming condition during subsequent opportunities. The investigation was unable to determine conclusively why the CS system startup strainers were not removed prior to system turnover to Operations; however, the investigation did conclude that primary and secondary factors contributing to the oversight were



personnel error involving inattention to detail, inadequate follow-up during the system turnover process from Startup to Operations, and inadequate pre-operational test procedure guidance.

Regarding the specific subject of NOV 50-529/95-08-01, APS failed to aggressively pursue, identify, and correct the nonconforming condition subsequent to system turnover from Startup to Operations on two of the three occasions discussed in NRC Inspection Report 50-528/529/530/95-08: 1) following receipt of NRC Information Notice (IN) 85-96, "Temporary Strainers Left Installed in Pump Suction Piping" and 2) following receipt of the Institute of Nuclear Power Operations Nuclear Network Operating Experience (OE) 5904, "Untabbed Temporary Startup Strainers Found in the Suction Piping for BRCCW Pumps." The APS investigation was unable to determine a conclusive root cause; however, factors that contributed to the cause were personnel error (inadequate documentation reviews and equipment walkdowns) and an inadequate configuration control program. As for the third occasion discussed in the NRC Inspection Report, APS may have missed an opportunity to identify the nonconforming condition during drawing reviews performed for the APS Design Basis Project; but, does not agree that the missed opportunity was a violation of 10CFR50, Appendix B, Criterion XVI.

In 1986, APS evaluated IN 85-96 and performed system walkdowns and document reviews to verify that startup strainers were removed. During the system walkdowns, no insulation was removed, and some inaccessible areas were not physically inspected. Where physical inspection was not possible, document reviews were performed to determine the startup strainer status. As a result of the inadequate



system walkdowns and document reviews, APS did not identify the presence of the startup strainers.

In 1993, APS reevaluated the actions taken in response to IN 85-96 to address OE 5904. APS concluded that the original actions taken in response to IN 85-96 were adequate, and there was no reason to question the validity of the previously performed system walkdowns or document reviews. As a result, no further action was taken, and the nonconforming condition continued to exist.

APS missed an opportunity to identify and correct the nonconforming condition during the drawing reviews performed for the Design Basis Project (1992 - 1993). The applicable drawings associated with the CS system included the startup strainers. APS assumed, based on the documented responses to IN 85-96 and OE 5904, that the startup strainers were physically removed from the system but were maintained on the drawing to identify their previous location in the event a strainer installation might be needed in the future. The drawings contained no reference or comment indicating the strainers were "temporary" or "to be removed." As a result, the applicable drawings were revised to add the following note: "This is the location of startup strainers if required. These strainers have been removed for normal operation." The drawing revision was considered an "inconsequential editorial comment" and performed under the provisions of a general revision. System walkdowns are not normally performed for general revisions, which is consistent with APS management expectations. Unfortunately, the documentation reviewed was in error. As a result, the nonconforming condition continued to exist until the strainers were discovered in February 1995.



Corrective Actions Taken and Results Achieved

A Significant Condition Investigation was conducted in accordance with the APS Corrective Action Program. As part of the investigation, the condition (startup strainer installed in normal operating systems) was evaluated for transportability to safety significant systems in all three units. (Transportability evaluations for the non-safety significant systems are being tracked and performed in accordance with the APS Corrective Action Program.) The problem was found to be transportable to the Fuel Pool Cooling (PC) system in Units 1 and 3 and the Condensate Transfer (CT) system in Unit 1. Operability reviews were performed on the affected systems including the CS system. Based on the operability reviews, the affected systems were determined to be capable of performing their safety function.

The startup strainers have been removed from the CS system in Unit 2. The removal of startup strainers located in the PC and CT systems has been scheduled and is being tracked in accordance with the APS Corrective Action Program.

Corrective Actions That Will Be Taken to Avoid Further Violations

The conditions that resulted in the failure to identify and correct the subject condition adverse to quality are historical in nature and do not represent current conditions at Palo Verde Nuclear Generating Station; therefore, no specific corrective actions to avoid further violations are needed. As a result of the Significant Condition Investigation, overall configuration control and response to industry issues in general were reviewed for generic implications. Regular assessments have been performed in

these areas to prevent similar situations. Scheduled reviews/audits of Corrective Action and Industry Operating Experience will continue to evaluate the effectiveness of these programs.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 3, 1995, when the last startup strainer was removed from train "B" of the CS system. (Note: Prior to March 3, 1995, an operability review of the CS system with startup strainers installed had been completed. The operability review determined the CS system was capable of performing its intended safety function.)

