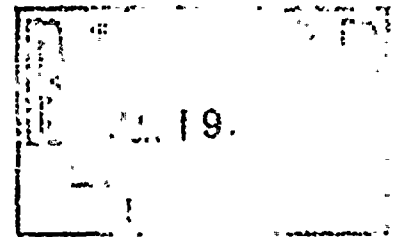


Arizona Public Service Company
P.O. BOX 53999 • PHOENIX ARIZONA 85070-3999

WILLIAM L. STEWART
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-03378-WLS/SAB/DRL
June 1, 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 Emergency Exercise Weaknesses
50-528/529/530/95-04-01 and 50-528/529/530/95-04-02**

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/95-04 dated April 27, 1995. We believe the report provides an accurate assessment of emergency plan implementation during the annual exercise. We are aggressively responding to correct the two identified exercise weaknesses. A description of the actions we are taking is provided in the enclosure to this letter.

Should you have any questions on our corrective actions, please contact Mr. Harry F. Bieling, Department Leader, PVNGS Emergency Planning, at (602) 393-6280.

Sincerely,

WLS/SAB/DRL/rv
Enclosure

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

95-1617

~~9506080652~~



ENCLOSURE

**REPLY TO EMERGENCY EXERCISE WEAKNESSES
INSPECTION REPORT NOS. 50-528/529/530/95-04-01**

AND

50-528/529/530/95-04-02



Reply to Emergency Plan Weaknesses
50-528/529/530/95-04-01 and 50-528/529/530/95-04-02

1. **50-528/529/530/95-04-01 Weakness**

The failure to make required offsite agency notifications within 15 minutes was identified as an exercise weakness.

Event Description

During the Palo Verde Nuclear Generating Station's (PVNGS) Annual Emergency Exercise, a General Emergency was declared at 11:20 a.m. and official notifications to State and County response agencies began at 11:41 a.m. over the Notification Alert Network (NAN). The delay in notifications occurred because the Government Liaison could not obtain the Emergency Operations Director's (EOD) approval signature on the notification form in a timely manner.

It should be noted that the EOD personally communicated the classification change, the Protective Action Recommendation (PAR) and plant status to the Technical Director at the State Technical Operations Center 13 minutes following the event classification.

The root cause of failure to make official notifications to State and County response agencies in a timely manner was determined to be personnel error. A contributing cause was process inefficiency.

Immediate Corrective Action

Initially, this weakness was self-identified by PVNGS exercise evaluators and discussed in the post exercise facility critique and at the senior management debriefing.

Corrective Actions to Prevent Recurrence

1. In order to ensure the EOD is promptly advised of an emergency classification change and that PAR's are considered, Emergency Plan Implementing Procedure (EPIP) 04 "Alert, Site Area and General Emergency Implementing Actions" will be revised to include a note for the Technical Support Center (TSC) Emergency Coordinator to discuss emergency classification



upgrades, as well as associated PAR's, with the EOD concurrent with classification change. This revision will be completed no later than June 30, 1995.

2. The Government Liaison and Satellite Technical Support Center (STSC) Communicators will be provided training on the importance of their responsibility for obtaining necessary information, including approval signatures, in order to complete State/County notification within 15 minutes of event classification. This training will be completed no later than August 25, 1995.
3. Responsibility to notify offsite emergency management agencies within 15 minutes via the NAN (with associated PAR's) will be emphasized in annual requalification training for Emergency Coordinators/Emergency Operations Directors scheduled to be conducted July 11- August 18, 1995. This training will be fully completed no later than August 25, 1995.

2. 50-528/529/530/95-04-02 Weakness

Providing conflicting and confusing information to offsite agencies was identified as an exercise weakness.

Event Description

During the PVNGS Annual Emergency Exercise, a Site Area Emergency was declared at 11:05 a. m. Shortly thereafter, the EOD informed the Technical Director at the State Technical Operations Center of the classification and that the site's PAR was to shelter in a 2 mile radius. Following this conversation, the initial NAN emergency message form, including PAR's, was approved by the EOD for transmittal to offsite agencies. The approved NAN message form included a check in section 3.a which states "There is no, repeat no, radioactive release related to this event taking place at this time. No protective actions are recommended at this time." This section was checked because there was no release in progress, however, PAR's were being made. The form indicated in a separate section that the site was recommending sheltering in a 2 mile radius and to 5 miles in Sectors E, F, and G. The assistant EOD noted the discrepancy on the approved form before the inconsistent PAR's were communicated over the NAN.

The reason for the error that nearly led to providing conflicting and confusing information to offsite agencies was personnel error. Contributing causes were that the initial NAN form is inadequate and the layout of the procedure table containing site PAR's is poor.

Immediate Corrective Action

Initially, this weakness was self-identified by PVNGS exercise evaluators and discussed in the post exercise facility critique and at the senior management debriefing. It is important to note that the incorrect information on the initial NAN emergency message form was caught by Emergency Operations Facility (EOF) personnel and corrected prior to transmission.

Corrective Actions to Prevent Recurrence

1. PVNGS, in consultation with the State/County, will correct and simplify the initial NAN form. This action will be completed no later than June 30, 1995.
2. PVNGS will revise the layout of the procedure table which contains PAR's, utilizing better human factors engineering. This action will be completed no later than June 30, 1995.
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 STEWART,W.L. Arizona Public Service Co. (formerly Arizona Nuclear Power
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 Document Control Branch (Document Control Desk)

SUBJECT: Responds NRC 950427 ltr re weaknesses noted in insp repts
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 EPIP-04, "Alert, Site Area & General Emergency Implementing
 Actions" will be revised.

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WILLIAM L. STEWART
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-03378-WLS/SAB/DRL
June 1, 1995

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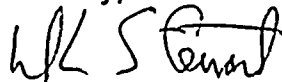
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cc: L. J. Callan
K. E. Perkins
B. E. Holian
K. E. Johnston
G. M. Good

9506080652 950601
PDR ADOCK 05000528
Q PDR





ENCLOSURE

**REPLY TO EMERGENCY EXERCISE WEAKNESSES
INSPECTION REPORT NOS. 50-528/529/530/95-04-01**

AND

50-528/529/530/95-04-02

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50-528/529/530/95-04-01 and 50-528/529/530/95-04-02

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