

# PRIORITY 1

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SUBJECT: Responds to NRC 951025 ltr re violations noted in insp  
 repts 50-528/95-16, 50-529/95-16 & 50-530/95-16 on 950813-  
 0923. Corrective actions: reporting/disposition request  
 3-5-0119 reclassified.

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WILLIAM L. STEWART  
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102-03557-WLS/AKK/RJH  
November 27, 1995

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

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Unit 1  
Docket Nos. STN 50-528  
Reply to Notice of Violation 50-528/95-16-01**

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/95-16 and the Notice of Violation (NOV) dated October 25, 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.

APS has reviewed the referenced report and agrees that APS Engineering should have conducted a more timely and thorough review of the Unit 3 charging pump issue. Although the charging pump issue may have indicated problems with coordination between engineering organizations in this specific case, APS believes that improvements have been implemented that enhance communication and coordination efforts for resolution of technical problems. To ensure consistency in responding to significant issues, APS has established a single-point-of-contact (SPOC) who is responsible to develop and communicate a plan of action. In the case of the charging pump issue, APS believes that the improper Condition Reporting/Disposition Request (CRDR) classification may have contributed to the lack of a timely investigation and root cause determination. Additional evaluation of the charging pump issue is currently being addressed under the APS corrective action program. In the case of the evaluation of the Ground Fault Relay (GFR) breakers, APS is currently reevaluating the original breaker replacement action plan, to determine the need to perform such replacements.

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

Sincerely,

*W L Stewart*

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Q PDR

*1/20/96*

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Reply to NOV 50-528/95-16-01  
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cc: L. J. Callan  
K. E. Perkins  
B. E. Holian  
K. E. Johnston

**ENCLOSURE 1**

**RESTATEMENT OF NOTICE OF VIOLATION 50-528/95-16-01**

**NRC INSPECTION CONDUCTED**

**AUGUST 13 THROUGH SEPTEMBER 23, 1995**

**INSPECTION REPORT Nos. 50-528/529/530/95-16**

**Restatement of Notice of Violation 50-528/95-16-01**

During an NRC inspection conducted on August 13 through September 23, 1995, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 60 FR 34381; June 30, 1995, the violation is listed below:

10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Procedure 90AC-OIP04, "Condition Reporting," Revision 6, Step 3.5.2.1, requires, in part, that the Condition Report/Disposition Report (CRDR) review committee classify a CRDR in accordance with the guidelines provided in Procedure 90DP-OIP03, Appendix G, "Condition Classification Guide."

Procedure 90DP-OIP03, "Condition Report Screening and Processing," Revision 6, Appendix G, "Condition Classification Guide," Guideline 2, defines "potentially significant," in part, as an event involving a single failure or other condition that concurrently affected (or had the potential to concurrently affect) the operability of components in multiple safety systems, or more than one independent train of a safety system (e.g., common mode failure). Furthermore, Guideline 10, defines "significant," in part, as an event involving plant safety or reliability that is judged to be significant due to its causes or consequences that may include two or more concurrent failures of redundant components or barriers.

Contrary to the above, on August 15, 1995, the CRDR review committee did not classify CRDR 3-5-0119 as "potentially significant" or "significant." This CRDR addressed an August 14 event, involving clogging of the seal water drain line for two of three safety-related charging pumps, and resulted in the two charging pumps being declared inoperable. The drain line clogging problem had the common mode potential to render all three pumps inoperable.

This is a Severity Level IV violation (Supplement I) applicable to Unit 1.

**ENCLOSURE 2**

**REPLY TO NOTICE OF VIOLATION 50-528/95-16-01**

**NRC INSPECTION CONDUCTED**

**AUGUST 13 THROUGH SEPTEMBER 23, 1995**

**INSPECTION REPORT Nos. 50-528/529/530/95-16**

Reply to Notice of Violation 50-528/95-16-01

Reason for the Violation

APS admits the violation.

On August 14, 1995, an auxiliary operator in Unit 3 noticed water in the oil of the A and B charging pumps. The charging pumps were immediately declared inoperable, and the action statement for two charging pumps inoperable was entered. Apparently, a seal water drain line had plugged which resulted in water backing up into the seal cavities and ultimately migrating through the oil seals and into the oil of both pumps.

The operations staff declared the two charging pumps inoperable and entered the appropriate action statement. The drain line was cleared, and the oil in both pumps was changed. The two charging pumps were declared operable, and the action statement was exited.

On August 15, 1995, CRDR 3-5-0119 was reviewed by the CRDR Review Committee (CRC) and classified as Adverse. The classification as Adverse was in keeping with the practice of the CRC of classifying hardware failures that resulted in an action statement entry as Adverse. This practice was established based on the fact that the Technical Specification Component Condition Record (TSCCR) procedure required an equipment root cause of failure analysis (ERCFA) to be performed for hardware failures that resulted in action statement entry.

Based on the results of the ERCFA, necessary corrective actions, including action to prevent recurrence, would be implemented. Since the Unit was in compliance with the action statement, these conditions were considered Adverse. Repeated hardware failures would be captured through the failure data trending program. Therefore, the practice of Adverse classification was considered appropriate for these conditions.

On August 28, 1995, a similar problem occurred in Unit 1. CRDR 1-5-0175 was initiated, and the CRC reviewed the CRDR. In keeping with the practice discussed above, the CRDR was classified as Adverse and closed to CRDR 3-5-0119. The CRC expected the ERCFA would be performed in accordance with the Component Condition procedure and would include all three charging pump failures and result in appropriate action to prevent recurrence.

On September 12, 1995, the Nuclear Assurance Division (NAD) Director met with the CRC Chairman, (NAD CRC representative) and discussed the charging pump events. The Director recommended that the CRC reevaluate the subject CRDRs in light of the fact that the actual occurrences meet or potentially meet the significance criteria used for classification of CRDRs, irrespective of whether the Unit complied with the appropriate Action Statements.

At the September 12th CRC meeting, the CRC determined that the occurrences in Units 1 and 3 could potentially meet the significance criteria and reclassified CRDR 3-5-0119 as Potentially Significant. The CRDR was transmitted to maintenance engineering with the request to "Determine through ERCFA if the failures represent a



deficiency in design, analysis, operation, maintenance and/or testing that could cause a significant event (i.e., common mode failure)."

On October 27, 1995, the CRC reviewed Engineering's response to the Potentially Significant CRDR. Based on Engineering's conclusion that the consequence of intrusion of water into the oil of two of three charging pumps had a strong potential to be more severe if the third pump had been affected (i.e., entry into T. S. 3.0.3 and shutdown of the Unit), the CRC reclassified CRDR 3-5-0119 as Significant.

#### **Corrective Actions Taken and Results Achieved**

As immediate corrective action, CRDR 3-5-0119 was reclassified as "Potentially Significant" on September 12, 1995. This action returned PVNGS to compliance with Procedure 90DP-OIP03, "Condition Report Screening and Processing."

A Human Performance Evaluation (HPES) was performed to determine the events/causes that led to the apparent misclassification of the CRDR. The primary cause was determined to be the practice of the CRC to classify equipment failures that resulted in the entry of a Unit into an action statement as Adverse without taking into account whether the failure actually met one of the significant criteria.

Nuclear Assurance has reviewed other Adverse CRDRs documenting hardware failures and has determined that the CRDRs have been appropriately classified.

During the recent Corrective Action audit, a sample of CRDRs was reviewed by the audit team to determine if classifications of CRDRs were being conducted correctly. The

audit team determined that classification of CRDRs was being accomplished in accordance with procedural requirements.

Based on the above reviews, it has been determined that the misclassification of CRDR 3-5-0119 does not represent a generic problem. Further, based on the fact that the Unit took immediate corrective action to return the charging pumps to operable status and that the Unit remained in compliance with all applicable technical specifications, the misclassification of the CRDR had no safety significance.

Procedure 90DP-01P03, "Condition Report Screening and Processing," was reviewed to determine whether this condition presented a weakness in the program for significance determination. The program was found to provide sufficient criteria to allow this type of condition to be designated as Significant and the program, therefore, found adequate.

#### **Corrective Actions That Will Be Taken To Avoid Further Violations**

APS has implemented the following actions to prevent recurrence. As corrective action to prevent recurrence, the CRC has been briefed on the results of this investigation. The CRC has also revised their practice of automatically classifying hardware failures resulting in action statement entry as Adverse. Each CRDR documenting a hardware failure is evaluated against the significance criteria to determine whether the failure meets or potentially meets any of the criteria.

Based on the actions taken above, no further corrective actions are considered necessary at this time.

**Date When Full Compliance Will Be Achieved**

Full compliance was achieved on September 12, 1995, when CRDR 3-5-01.19 was reclassified as Potentially Significant in accordance with station procedure 90DP-0IP03, "Condition Report Screening and Processing."