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ACCESSION NBR:9605280260 DOC.DATE: 96/05/22 NOTARIZED: NO DOCKET #
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 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
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 RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards response to NRC 960423 ltr re violations noted in
 insp repts 50-528/96-04-01,50-529/96-04-01 & 50-530/96-04-01
 on 960318-22.C/A:individual working under REP 2-96-3504A was
 coached by RP mgt on importance of REP compliance.

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Arizona Public Service

PALO VERDE NUCLEAR GENERATING STATION
P.O. BOX 52034 PHOENIX, ARIZONA 85072-2034

102-03706-WLS/AKK/DRL

May 22, 1996

WILLIAM L. STEWART
EXECUTIVE VICE PRESIDENT
NUCLEAR

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 50-529/96-04-01

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/96-04 and the Notice of Violation (NOV) dated April 23, 1996. 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 agrees with the NRC that the actual safety consequences of these two occurrences were minimal, however the need to follow the existing procedures and guidance is essential. Our program does allow flexibility to adjust for conditions less stringent than originally expected and controls are not to be relaxed until appropriately evaluated. Individual awareness and compliance of radiation exposure permit (REP) controls is critical to our program integrity, to which we are firmly dedicated. It is APS' intent to perform further evaluation of this issue in the continuance of our commitment to excellence.

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

Sincerely,

W L Stewart

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Reply to Notice of Violation 50-529/96-04-01
Page 2

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Enclosures:

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

cc: L. J. Callan
C. R. Thomas
K. E. Johnston
K. E. Perkins



ENCLOSURE 1

RESTATEMENT OF NOTICE OF VIOLATION 50-529/96-04-01

NRC INSPECTION CONDUCTED MARCH 18 THROUGH

MARCH 22, 1996

INSPECTION REPORT No. 50-528/529/530/96-04



RESTATEMENT OF NOTICE OF VIOLATION 50-529/96-04-01

During an NRC inspection conducted on March 18-22, 1996, a 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:

- Technical Specification 6.8.1.a. requires, in part, that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Section 7.e(1) of Appendix A of Regulatory Guide 1.33 includes procedures for the radiation exposure permit system.

Plant Procedure 75RP-9RP02, "Radiation Exposure Permits," Revision 9, Section 3.5.1.1 states in part, that workers shall ensure they have read and understood the conditions of the radiation exposure permit prior to signing the "REP Sign-In Sheet." Section 4.1.13 states that a signature indicates that the individual has read and understood the radiation exposure permit and will comply with all instructions and requirements. Section 4.1.12 states, in part, that the radiation protection technician (providing job coverage) shall ensure that the workers are aware of the requirements of the radiation exposure permit. Section 4.1.12.2 states, in part, that the radiation protection technician shall monitor work . . . to ensure that the requirements of the radiation exposure permit are met.

Radiation Exposure Permit 2-96-3504A required workers to notify radiation protection personnel prior to working in the overhead and to review current radiological survey maps for the work area.

Radiation Exposure Permit 2-96-3306A instructed workers to wear face shields.

Contrary to the above,

1. On March 19, 1996, an individual authorized to perform work under Radiation Exposure Permit 2-96-3504A failed to contact radiation protection personnel and review radiation survey information before working in the overhead area of the cooling water tank/pump room on the 40-foot elevation of the auxiliary building.
2. On March 19, 1996, two workers were observed cleaning steam generator manway stud holes without wearing face shields. Two radiation protection



technicians provided continuous job coverage but did not instruct the two workers to follow the requirements of Radiation Exposure Permit 2-96-3306A.

This is a Severity Level IV violation (Supplement IV) (529/9604-01).



ENCLOSURE 2

REPLY TO NOTICE OF VIOLATION 50-529/96-04-01

NRC INSPECTION CONDUCTED MARCH 18 THROUGH

MARCH 22, 1996

INSPECTION REPORT Nos. 50-528/529/530/96-04

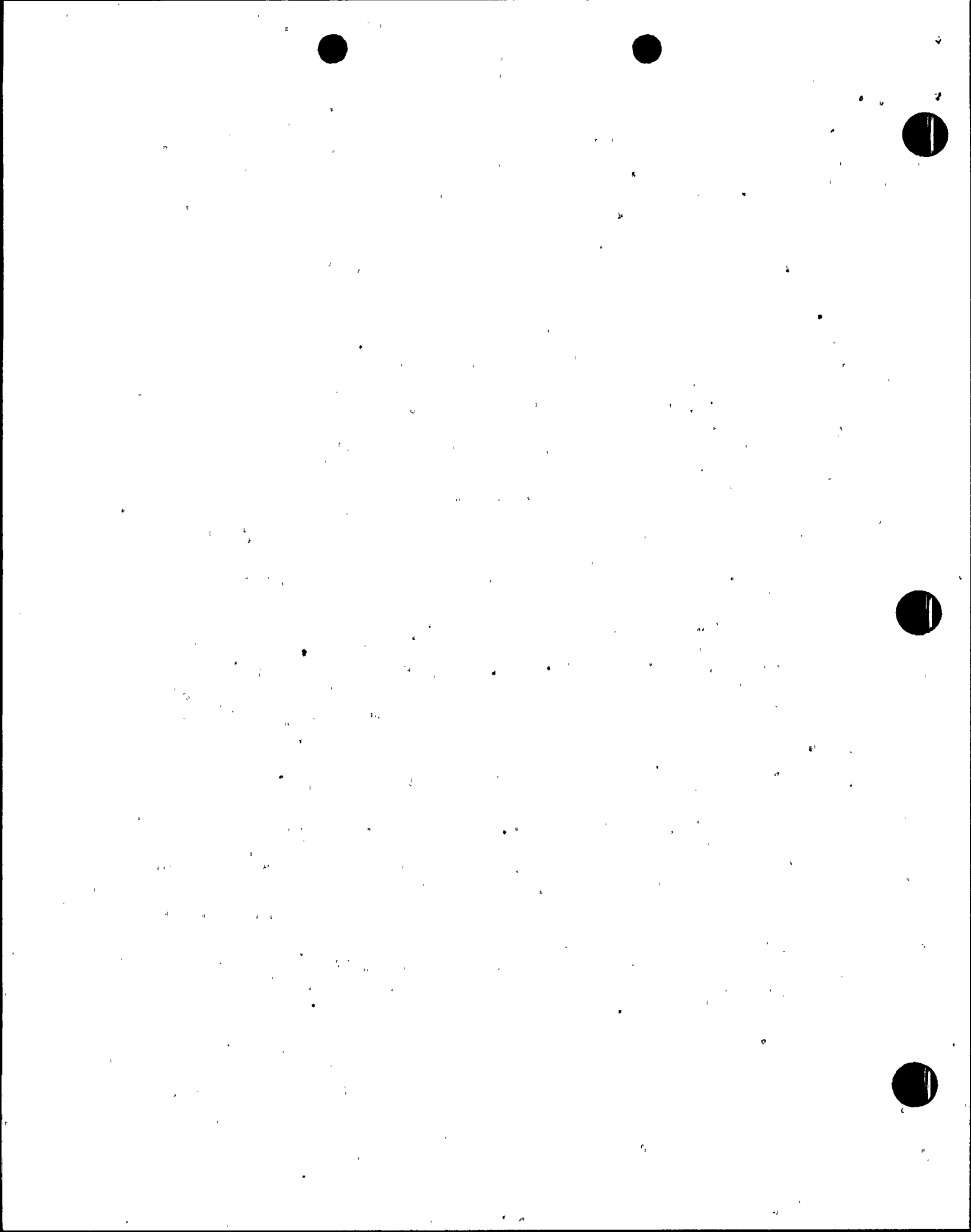


REPLY TO NOTICE OF VIOLATION 50-529/96-04-01

Reason For The Violation

PVNGS accepts the violation.

1. The individual authorized to perform work under Radiation Exposure Permit (REP) 2-96-3504A failed to notify RP that he needed to work in the overhead which was not covered by the REP. Personnel are given training (NGW01-11-RC-001-004) which informs radiological workers of their responsibility to inform Radiation Protection (RP) personnel of any change in job scope/task while working in the Radiological Controlled Area (RCA). This training specifically discusses the concerns and requirements for accessing the overheads which is defined as six feet or greater from the floor level. The individual's signature on the REP sign-in sheet denotes that the worker has read and understands the conditions of the Radiation Exposure Permit. The individual's failure to inform RP personnel prior to performing work in the overhead is identified as a cognitive personnel error.
2. REP 2-96-3306A required the use of faceshields. Faceshields are used at Palo Verde Nuclear Generating Station (PVNGS) as a part of protective clothing. The purpose of the face shield is to prevent contamination. Radiological evaluation and work scope determine the need or benefit of their use. Steam generator manway stud hole cleaning has, historically, presented a low potential for facial contamination or a localized airborne hazard but the REP is designed to cover these potentials. Prior to the commencement of work, Radiation Protection technicians assigned to cover this task surveyed the manway studs and stud holes



noting 3,000-15,000 disintegration per minute (dpm) per 100 square centimeters. These contamination levels did not represent the need for face shields. In many circumstances, REP allowing, the RP technicians are permitted to make adjustments to the protective clothing based on the work and survey results. In this case, the RP technicians were not fully aware of the REP requirements. The failure of the workers to follow REP requirements and the RP technicians failure to properly enforce or properly downgrade this provision is determined to be cognitive personnel error.

Corrective Steps That Have Been Taken and Results Achieved

1. The individual working under REP 2-96-3504A was coached by RP management on the importance of REP/procedural compliance. The individual understands the potential impact of failure to comply with REP/procedural compliance.
2. Both workers and the RP technicians associated with REP 2-96-3306A were coached on the importance of fully complying with the requirements of the Radiation Exposure Permit. The RP technicians were also coached to ensure the administrative process, outlined in REP's, for downgrading protective clothing requirements is followed.

Corrective Steps That Will Be Taken To Avoid Further Violations

1. RP management will evaluate the process used for authorization of protective clothing downgrades in the field. The results of this evaluation and any necessary



corrective actions will be documented in accordance with the PVNGS Corrective Action Program.

Date When Full Compliance Will Be Achieved

1. For REP 2-96-3504A, full compliance was achieved on March 19, 1996 when the area was surveyed and evaluated by RP and the worker was informed of the radiological conditions.
2. For REP 2-96-3306A, full compliance was achieved on March 19, 1996 when the RP Section Leader reviewed the as-found radiological conditions data and determined that, in accordance with REP requirements for downgrade options, steam generator manway stud hole cleaning could continue without face shields.

