

CATEGORY 1

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ACCESSION NBR: 9609040092 DOC. DATE: 96/08/22 NOTARIZED: NO DOCKET #
 FACIL: STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528
 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530

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 Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to violations noted in Insp Repts
 50-528/96-11, 50-529/96-11 & 50-530/96-11. Corrective actions:
 10CFR50.59 screening & evaluation revised & Question 1
 answered "Yes."

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Arizona Public Service
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P O BOX 52034 PHOENIX, ARIZONA 85072-2034

102-03756-WLS/AKK/RJH

August 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 Notices of Violation 50-529/96-11-01
and 50-528/529/530/96-11-02

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/96-11 and the Notices of Violation (NOV) dated July 26, 1996. Pursuant to the provisions of 10 CFR 2.201, APS' response is enclosed.

In response to the concern identified in the first violation, APS believes that a combination of weak self checking practices and incorrect assumptions made by personnel when reviewing license basis documents contributed to the inadequate review and performance of the 10CFR50.59 screening/evaluation for the Qualified Safety Parameter Display System (QSPDS). APS' investigation of this event concluded that the incorrect assumption during the 10CFR50.59 screening/evaluation was an administrative error only, and that the minimum number of Core Exit Thermocouples (CETs) as required by plant technical specifications and Regulatory Guide 1.97 were more than adequate to maintain core monitoring requirements.

In response to the concerns identified in the second violation, APS performed a review of the administrative controls and associated implementing procedures with regard to ingress and egress of personnel in the security headquarters. The review concluded that the program and associated procedure requirements are well established and clearly define the requirements for entering and exiting plant protected areas. Station management clarified expectations for personnel performing work in the security headquarters ingress area. Continued emphasis will be applied to improve the implementation of these controls and enhance worker knowledge of security monitoring requirements.

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U. S. Nuclear Regulatory Commission

ATTN: Document Control Desk

Reply to Notices of Violation 50-529/96-11-01 and 50-528/529/530/96-11-02

Page 2

In summation, APS believes that the lessons learned from these events will heighten the awareness of plant personnel concerning the importance of following procedures during routine and non-routine tasks. In addition, enforcement of management expectations and personnel training on these events will ensure future compliance in this area. Although personnel performance did not meet management expectations for these areas, neither of these events resulted in a compromise to nuclear safety.

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

Sincerely,

WLS/AKK/RJH/rv
Enclosures



cc: L. J. Callan
J. W. Clifford
K. E. Johnston
K.E. Perkins

ENCLOSURE 1

RESTATEMENT OF NOTICE OF VIOLATION 50-529/96-11-01

AND

REPLY TO NOTICE OF VIOLATION 50-529/96-11-01

NRC INSPECTION CONDUCTED JUNE 2, 1996

THROUGH JULY 13, 1996

INSPECTION REPORT No. 50-528/529/530/96-11



RESTATEMENT OF NOTICE OF VIOLATION 50-529/96-11-01

During an NRC inspection conducted on June 2 through July 13, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR 50.59, "Changes, tests, and experiments," states in part that the licensee may make changes in the facility as described in the safety analysis report without prior Commission approval unless the proposed change involves a change in the Technical Specifications or an unreviewed safety question.

Procedure 90AC-ONS01, Revision 4, "10 CFR 50.59 Screenings and Evaluations," establishes the method for meeting the requirements of 10 CFR 50.59.

Step 3.2.4 of the procedure states, in part, that, "Questions 1 through 4 are used to screen the change to determine whether or not a 10 CFR 50.59 evaluation is required. In answering Questions 1 through 4, the appropriate 'Yes' or 'No' box shall be checked."

Appendix A of the procedure provides the 10 CFR 50.59 screening and evaluation form, including Question 1, which states, "Does the proposed change make changes in the facility as described in the Licensing Basis"

Appendix C of the procedure provides guidance on answering the screening questions and defines a change in the facility as described in a Licensing Basis document to include the Combustion Engineering Standard Safety Analysis Report (CESSAR).

CESSAR, Chapter 17, Appendix B, Table 3-2, "Evaluation of ICC Detection Instrumentation to Attachment 1 of II.F.2," states, in part, that the facility has 61 core exit thermocouples (CETs) and that both channels of the Quality Safety Parameter Display System (QSPDS) displays together display all CET temperatures.

Contrary to the above, on June 21, the licensee made a change to the facility as described in the licensing basis, in that the change reduced the number of CETs which displayed on the QSPDS from 61 to 45, and did not answer Question 1 of Procedure 90AC-ONS01, Appendix A, "Yes."

This is a Severity Level IV violation (Supplement I) applicable to Unit 2.

REPLY TO NOTICE OF VIOLATION 50-529/96-11-01

PVNGS accepts the violation.

Reason For The Violation

The APS Updated Final Safety Analysis Report (UFSAR) refers to the Combustion Engineering Standard Safety Analysis Report (CESSAR) for QSPDS design configuration. CESSAR, Appendix B, Table 3-2, Evaluation of ICC Detection Instrumentation to Attachment 1 of II.F.2, Item 1, Response states in part: "The System 80 design has 61 core exit thermocouples (CETs) distributed uniformly over the top of core." Item 3 Response states: "The QSPDS displays fulfill the requirements for the safety grade backup displays. Both channels of QSPDS displays together display all CET temperatures. All CET temperatures can be displayed within 6 minutes."

Contrary to the above, on June 21, I&C Maintenance and Maintenance Engineering made a change to the facility as described in the licensing basis, in that the change reduced the number of CETs which are displayed on the QSPDS from 61 to 45. This reduction in the number of CETs was not correctly identified as a change to the facility during the 10CFR50.59 evaluation.

During the 50.59 screening process, the engineer performed a review of the Updated Final Safety Analysis Report (UFSAR) and the CESSAR. The engineer reviewed the responses to NRC questions and UFSAR Table 18.II.F.2-2, Design and Qualification Criteria for Pressurized Water Reactor Incore Thermocouples (3) which states:



Reason For The Violation (Cont'd)

"A backup display (or displays) which should be provided with the capability for selective reading of a minimum of 16 operable thermocouples, four from each core quadrant, all within a time interval no greater than 6 minutes." The engineer failed to consider all pertinent information regarding the license basis documents during the 50.59 screening process.

Subsequent to the 50.59 screening, the 50.59 Technical Reviewer performed a review of the proposed 50.59 and was aware that the system contained 61 CETs, but was not aware that the precise number was specified in the CESSAR. The Technical Reviewer did not perform a review of the CESSAR, but did review the UFSAR and the applicable Technical Specification and was satisfied that the proposed QSPDS configuration did not represent a change to the facility as described in the licensing basis.

The root cause of this event was determined to be a failure of ~~18C~~ Maintenance Engineering to recognize that a change to the Unit 2 QSPDS represented a change to the facility as described in the safety analysis report and to review the change to determine whether it represented an unreviewed safety question.

Reason For The Violation (Cont'd)

Other causal factors which contributed to the event:

1. The Engineer misinterpreted the written response in the CESSAR concerning the number of CETs versus the minimum number of CETs required.
2. The Technical Reviewer made an incorrect assumption that the CESSAR contained descriptions of systems and components and did not contain specific minimum numbers of CETs.
3. The Technical Reviewer's successful past performance, familiarity with the system, and number of times working on the system provided for a sense of mastery of the system that lead to false assumptions when performing the review.

Corrective Steps That Have Been Taken and Results Achieved

The 10CFR50.59 screening and evaluation has been revised. Question 1 has been answered "yes" and a 10CFR50.59 evaluation was completed which addressed questions 5 through 11 on the 10CFR50.59 Screening and Evaluation Form. The evaluation determined that an Unreviewed Safety Question did not exist.

The 50.59 Screener/Evaluator has been coached regarding management's expectations for conducting a thorough review of license basis documents when performing 50.59 evaluations. Specifically, the degree of conservatism expected by management when making screening decisions during the conduct of a 10CFR50.59.

Corrective Steps That Have Been Taken and Results Achieved (Cont'd)

The 50.59 Reviewer was coached regarding the responsibility for the reviewing the adequacy and accuracy of the 10CFR50.59 Screening and Evaluations. Emphasis was placed on the use of required documents during the technical review (CESSAR) and the use of self-checking.

Corrective Steps That Will Be Taken To Avoid Further Violations

This event and the degree of conservatism expected by management when making screening decisions during the conduct of a 10CFR50.59 will be discussed in the I&C Maintenance Engineering Third Quarter Industry Events by September 30, 1996.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on June 25, 1996, when the 10CFR50.59 screening and evaluation was revised. Question 1 was answered "yes" and a 10CFR50.59 Evaluation was completed which addressed questions 5 through 11 on the 10CFR50.59 Screening and Evaluation Form. The evaluation determined that an Unreviewed Safety Question did not exist.

10

ENCLOSURE 2

RESTATEMENT OF NOTICE OF VIOLATION 50-528/529/530/96-011-02

AND

REPLY TO NOTICE OF VIOLATION 50-528/529/530/96-11-02

NRC INSPECTION CONDUCTED JUNE 2, 1996

THROUGH JULY 13, 1996

INSPECTION REPORT No. 50-528/529/530/96-11



RESTATEMENT OF NOTICE OF VIOLATION 50-528/529/530/96-11-02

During an NRC inspection conducted on June 2 through July 13, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

Paragraph 2.E. of the Facility Operating License No. NPF-41 for Palo Verde Nuclear Generating Station requires the licensee to fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans, including all amendments to those plans made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55, and pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

10 CFR 73.55 (d)(1) prescribes, in part, that the licensee shall control all points of personnel and vehicle access into a protected area (PA). Identification and search of all individuals unless otherwise provided herein must be made and authorization must be checked at these points. The search function for detection of firearms, explosives, and incendiary devices must be accomplished through the use of both firearms and explosive detection equipment capable of detecting those devices. The licensee must subject all persons except bona fide Federal, State, and local law enforcement personnel on official duty to these equipment searches upon entry to a PA.

10 CFR 73.55 (d)(2) states, "At the point of personnel and vehicle access into a PA, all hand-carried packages shall be searched for devices such as firearms, explosives, and incendiary devices, or other items which could be used for radiological sabotage."

Paragraph 5.3.2 of the licensee's physical security plan states, in part, "Equipment searches of personnel are required of individuals entering the PA."

Paragraph 5.3.7 of the licensee's physical security plan states, in part, "Packages, materials and items shall be physically searched or machine searched in accordance with Palo Verde Nuclear Generating Station procedures prior to their entry into the PA."

Paragraph 3.2.1.4 of security procedure 20DP-OSK22, Revision 8, "Protected Area Ingress and Egress Control," states, in part, "Personnel screening - ensure that personnel satisfactorily complete all screening requirements (nitrate detector, x-ray, and metal detector) prior to being allowed access to the PA. Material screening - ensure that all hand carried items, packages and materials are properly searched prior to admittance to the PA."

RESTATEMENT OF NOTICE OF VIOLATION 50-528/529/530/96-11-02 (Cont'd)

Contrary to the above, on July 3, 1996, an NRC inspector observed that a person did not satisfactorily complete all screening requirements and ensure that their hand carried items were properly searched prior to being allowed into the PA. Specifically, a janitorial employee, carrying a plastic trash receptacle bag, entered the PA without processing through search equipment.

This is a Severity Level IV violation (Supplement III) applicable to Units 1, 2, and 3.



REPLY TO NOTICE OF VIOLATION 50-528/529/530/96-11-02

APS accepts the violation.

Reason For The Violation

On July 5, 1996, an NRC Resident Inspector observed a condition where an APS contract employee did not satisfactorily complete all screening requirements and ensure that their hand carried items were properly searched prior to being allowed into the Protected Area (PA). Specifically, a contract janitorial employee, carrying a plastic trash bag, entered the PA without processing through search equipment.

The violation involved the failure of security personnel to perform an adequate search of personnel and equipment entering the PA. Security personnel believed that it was acceptable to allow items used for janitorial purposes into the PA without passing through the search equipment as long as security personnel provided continuous observation of the items during their use in the security headquarters.

Corrective Steps That Have Been Taken and Results Achieved

On July 5, 1996, on-duty security force members were briefed to ensure trash containers located in the Security Headquarters ingress area are staged behind the nitrate detectors, so that anything deposited in them will have been screened first. All security operations personnel received this briefing prior to being assigned to ingress posts.



Corrective Steps That Have Been Taken and Results Achieved (Cont'd)

On July 11, 1996, the following compensatory measures were implemented requiring members of the security maintenance group, janitorial services, and any other personnel performing work in the security ingress area, to do the following:

1. Process completely through all search train equipment and proceed with work as required, under the observation of a member of the security force in order to enter the protected area (PA) (through the entry² turnstiles) process through the complete search train again. Should non-security personnel require access to the bullet resistant area in headquarters, they shall enter the PA via the entry turnstiles and utilize doors H-22 or H-13 for access. All hand-held items must be processed through the search train prior to entry to the PA.. Only on-duty members of the security force may utilize door H-14.
2. Janitorial personnel shall bring non-searchable cleaning equipment (such as full mop buckets) from outside of the PA, work under the observation of a member of the security force, and take the item back outside the PA for disposal. Empty mop buckets, etc. ~~may~~ be processed into the PA via normal procedures.

On-duty security force members applies to security shift personnel actually on duty. These are the only personnel authorized to use door H-14.

Briefings were conducted for all security personnel. This briefing was revised for further clarification on July 12, 1996. As a result of these corrective actions, there has been no recurrence of the original condition.

Corrective Steps That Have Been Taken and Results Achieved (Cont'd)

Security expectations were clarified regarding the status of the Security Headquarters ingress area as being considered outside of the PA.. All personnel who enter the PA must first process through the search train, including those who have already processed through and stepped back in front of the explosive detectors.

Corrective Steps That Will Be Taken To Avoid Further Violations

None required.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on July 5, 1996, when the contract employee processed the trash bag through security monitoring equipment and was approved for release into the protected area to resume duties. On July 11, 1996 security operations personnel were briefed on the expectations regarding the use of search train equipment for items entering the protected area.



100