

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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SUBJECT: Responds to NRC 961205 ltr re violations noted in insp rept
 50-528/96-16. Corrective actions: training change sys item was
 issued to evaluate event for inclusion into future license
 training.

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102-03836-JML/AKK/DLK
January 03, 1997

U. S. Nuclear Regulatory Commission
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Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1
Docket No. STN 50-528
Reply to Notice of Violation 50-528/96-16-01**

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/96-16 and the Notice of Violation (NOV) dated December 5, 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.

The violation involved two examples of personnel failing to follow procedures prior to initiating Reactor Coolant System (RCS) drain operations and were associated with the performance and maintenance of valve line-ups while operating in a reduced inventory condition. In addition to coaching the responsible personnel, the corrective actions being taken for this violation focus on enhancing the human factors and strengthening the control of valve line-ups in the RCS drain operations procedure.

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

Sincerely,

JML/AKK/DLK

Enclosures

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

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PDR ADCK 05000528
Q PDR

ENCLOSURE 1

RESTATEMENT OF NOTICE OF VIOLATION 50-528/96-16-01

**NRC INSPECTION CONDUCTED OCTOBER 6 THROUGH
NOVEMBER 16, 1996**

INSPECTION REPORT NO. 50-528/529/530/96-16



RESTATEMENT OF NOTICE OF VIOLATION 50-528/96-16-01

During an NRC inspection conducted on October 6 through November 16, 1996, one 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:

Unit 1 Technical Specification 6.8.1 requires, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Revision 2, Appendix A, requires, in part, written procedures for draining the reactor coolant system (RCS).

Procedure 40OP-9ZZ16, Revision 5, "RCS Drain Operations," provides instructions necessary to drain the RCS. Step 6.2.3 (prerequisite for draining the RCS) requires a drain path aligned per Appendix Q. Appendix Q, Section 2.0, provides the lineup for the normal drain path to the refueling water tank (RWT). Appendix Q, Section 2.0, requires Valves CHN-V655 and PCN-V024 to be closed and Valve CHN-V495, to be open.

Contrary to the above:

On October 20, 1996, the operations midloop team initiated draining the RCS to the RWT and did not have a drain path aligned per Appendix Q, Section 2.0, in that Valves CHN-V655 and PCN-V024 were open and Valve CHN-V495 was closed.

On October 20, 1996, two auxiliary operators, an initial positioner and independent verifier, performing Section 2.0 of Appendix Q, did not ensure that Valve CHN-V495 was open.

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



ENCLOSURE 2

REPLY TO NOTICE OF VIOLATION 50-528/96-16-01

**NRC INSPECTION CONDUCTED OCTOBER 6 THROUGH
NOVEMBER 16, 1996**

INSPECTION REPORT NO. 50-528/529/530/96-16



REPLY TO NOTICE OF VIOLATION 50-528/96-16-01

Reason For The Violation

The Notice of Violation (NOV) included two examples of failing to follow procedure.

Each example is addressed separately.

The first example involved a night shift midloop team that initiated a Reactor Coolant System (RCS) drain operation with an incorrect valve line-up. The midloop Control Room Supervisor (CRS) incorrectly assumed that paperwork for a previous valve lineup was valid for the current condition. Several days earlier however, the RCS drain path line-up had been modified to accommodate draining a relatively small amount of water from the RCS to the Holdup Tank. The documentation authorizing the modified valve line-up was misplaced. The RCS drain operation was initiated with an incorrect valve line-up. When the midloop CRS observed water level rising in the Holdup Tank instead of the Refueling Water Tank, the RCS drain operation was stopped and an investigation was initiated.

The reason for the first example was poor work practices on the part of the midloop team in that the system line-up status was not physically verified prior to performing the RCS drain operation.

The second example involved two oncoming auxiliary operators who were given an immediate assignment to perform a valve line-up and verification in accordance with the approved "RCS Drain Operations" procedure. Both operators went to the field together - one operator checking valve position, the other operator verifying valve position. After checking and verifying the valve line-up in the gas stripper room, the operators started to leave when they realized that one of the valves on the RCS drain operation line-up sheet, CHN-V495, was also in the gas stripper room. The operator checking valve positions went back into the gas stripper room without the valve line-up sheet in hand and found CHN-V495 locked closed. CHN-V495 is normally locked closed in accordance with the "Locked Valve, Breaker, and Component Control Program" and frequently checked locked closed by operators for other valve line-ups. The first operator expected the valve to be closed, incorrectly checked the valve closed instead of open, as required by the valve lineup sheet, and left the gas stripper room. The second operator verifying valve positions then entered the gas stripper room, misread the valve line-up sheet, verified CHN-V495 closed instead of open, and left the gas stripper room. Both operators then initialed the valve line-up sheet. Control Room personnel again attempted to divert letdown water from the volume control tank to verify the drain path alignment; however, the RCS would not drain because CHN-V495 was closed. The two operators assigned to perform the valve line-up check and verification failed to properly follow the approved procedure.



The reasons for the second example were poor work practices and inattention to detail on the part of the two auxiliary operators in that the approved procedure was not followed. A contributing reason was that normal expected independent verification practices were not followed because the two operators went into the field together.

Corrective Steps That Have Been Taken and Results Achieved

In the first example, the midloop CRS stopped the RCS drain operation and initiated an investigation to verify the valve line-up. As discussed above, the first valve line-up and verification failed to correct the initial system line-up problem. This became evident after a second attempt to drain the RCS failed. Following the failed second attempt, the two auxiliary operators referred to in the second example, returned to the Control Room and re-reviewed the valve line-up sheet. Both operators immediately recognized they had verified CHN-V495 closed instead of open. The operators returned to the gas stripper room, obtained permission from the Control Room, and opened CHN-V495. The operators then re-verified the entire RCS Drain Operation valve line-up. At this point, operations personnel successfully initiated the RCS drain operation.

The auxiliary operators involved with the valve line-up discussed in the second example received coaching on independent verification and attention to detail.

A Training Change System item was issued to evaluate the event for inclusion into future license training.

Corrective Steps That Will Be Taken To Avoid Further Violations

The following corrective steps will be taken to prevent further violations:

The current status controls in the RCS drain operations procedure will be evaluated to ensure line-ups are performed and maintained while performing RCS drain operations. Recommended changes will be incorporated into the RCS drain operations procedure.

The applicable appendix in the RCS drain operation procedure will be improved to better identify CHN-V495 as a valve that is required to be open.

The results of the investigation of this event will be discussed in the next midloop Department Leader briefing.



Date When Full Compliance Will Be Achieved

Full compliance was achieved on October 20, 1996 when the valve line-up for RCS drain operations was correctly performed and RCS drain operations were successfully initiated.

