



MAY 02 1997 *23*

Palo Verde Nuclear
Generating Station

James M. Levine
Senior Vice President
Nuclear

TEL 602/393-5300
FAX 602/393-6077

Mail Station 7602
P O Box 52034
Phoenix AZ 85072-0034

102-03919-JML/AKK/DRL
April 29, 1997

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station: P1-37
Washington, DC 20555-0001

102-03919
102-03919
102-03919

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN ~~50-528/529/530/97-07~~
Reply to Notice of Violation ~~50-530/97-07-03~~

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/97-07 and the Notice of Violation (NOV) dated March 31, 1997. 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.

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

Sincerely,

JML/AKK/DRL
Enclosures:

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

cc:

~~James M. Levine~~
J. W. Clifford
K. E. Johnston
K. E. Perkins

6/p.
97-1009
97-1009
Do



ENCLOSURE 1

RESTATEMENT OF NOTICE OF VIOLATION 50-530/97-07-03

NRC INSPECTION CONDUCTED MARCH 10 THROUGH

MARCH 14, 1997

INSPECTION REPORT No. 50-528/529/530/97-07



RESTATEMENT OF NOTICE OF VIOLATION 50-530/97-07-03

During an NRC inspection conducted on March 10-14, 1997, 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: .

10 CFR 20.1003 defines a radiation area as an area accessible to individuals in which radiation levels could result in an individual receiving a dose equivalent in excess of 5 millirem in 1 hour at 30 centimeters from the radiation source or from any surface that the radiation penetrates.

10 CFR 20.1902 (a) requires that radiation areas be posted with a conspicuous sign or signs bearing the radiation symbol and the words "CAUTION RADIATION AREA."

Contrary to the above, on March 12, 1997, the inspector identified that the Unit 3 fuel building west stairway leading to the 140 foot elevation, which involved radiation levels of 10 millirem per hour at 30 centimeters, was not posted as "Caution Radiation Area" from March 4-12, 1997.

This is a Severity Level IV violation (Supplement IV) (530/9707-03).



ENCLOSURE 2

REPLY TO NOTICE OF VIOLATION 50-530/97-07-03

NRC INSPECTION CONDUCTED MARCH 10 THROUGH

MARCH 14, 1997

INSPECTION REPORT Nos. 50-528/529/530/97-07



REPLY TO NOTICE OF VIOLATION 50-530/97-07-03

Reason For The Violation

Prior to February 28, 1997, the 100' and 140' elevations of the Unit 3 Fuel Building were considered radiation areas. Access points to these areas, including the west stairwell, were properly posted as "Caution Radiation Area". This is best understood (envisioned) as two radiation area islands connected by a non-radiation area stairwell (west). This west stairwell connects the 140' to the 100' and nothing else.

Incident investigators determined that on February 28, 1997, Radiation Protection (RP) personnel removed an apparent extra posting on the 140' west stairwell while failing to identify and remove the 100' west stairwell posting. The investigators found that RP personnel envisioned, with the removal of the apparent extra posting, one large radiation area consisting of the 100', 140' and the connecting west stairwell.

On March 12, 1997, an NRC inspector identified the 100' west stairwell radiation area posting with no posting at the connecting 140' elevation. Under this condition, a worker ascending the west stairwell, starting at the 100' elevation, would conclude that they had exited one radiation area island, were climbing a non-radiation area stairwell and would arrive at a 140' non-radiation area even though the 140' was actually a radiation area. This created an unposted access point to the 140' radiation area.

Following NRC identification, the 100' west stairwell radiation area posting was removed which resulted in a configuration of one large radiation area: the 100', 140' and the connecting stairwell.

The root cause of this event is attributed to personnel error due to a lack of attention to detail which occurred on February 28, 1997 when RP personnel failed to identify and remove the radiation area posting at the 100' of the Unit 3 Fuel Building west stairwell.

Corrective Steps That Have Been Taken and Results Achieved

Upon identification, the additional radiation area posting located on the 100' elevation of the Unit 3 Fuel Building was promptly removed resulting in compliance with 10 CFR 20.1902(a) requirements.

Discussions on this event were held with RP personnel during shift turnover meetings on March 13, 1997.

Corrective Steps That Will Be Taken To Avoid Further Violations

This event, the importance of attention to detail and considering adjacent areas when performing posting changes will be covered with RP personnel during upcoming quarterly training.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 12, 1997 when the additional radiation area posting was removed.

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9705050110 DOC. DATE: 97/04/29 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

AUTH. NAME: LEVINE, J.M. AUTHOR AFFILIATION: Arizona Public Service Co. (formerly Arizona Nuclear Power
 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to violations noted in insp repts
 50-528/97-07, 50-529/97-07 & 50-530-97/-07. Corrective
 actions: discussions on event held w/RP personnel during
 shift turnover meetings on 970313.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES: STANDARDIZED PLANT 05000528
 Standardized plant. 05000529
 Standardized plant. 05000530

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD4-2 PD	1 1	CLIFFORD, J	1 1
INTERNAL: ACRS	2 2	AEOD/SPD/RAB	1 1
AEOD/TTC	1 1	DEDRO	1 1
FILE CENTER	1 1	NRR/DISP/PIPB	1 1
NRR/DRCH/HHFB	1 1	NRR/DRPM/PECB	1 1
NRR/DRPM/PERB	1 1	NUDOCS-ABSTRACT	1 1
OE DIR	1 1	OGC/HDS2	1 1
RGN4 FILE 01	1 1		
EXTERNAL: LITCO BRYCE, J H	1 1	NOAC	1 1
NRC PDR	1 1	NUDOCS FULLTEXT	1 1

NOTE TO ALL "RIDS" RECIPIENTS:
 PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS
 OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL
 DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTTR 20 ENCL 20





Palo Verde Nuclear
Generating Station

James M. Levine
Senior Vice President
Nuclear

TEL (602)393-5300
FAX (602)393-6077

Mail Station 7602
P.O. Box 52034
Phoenix, AZ 85072-2034

102-03919-JML/AKK/DRL
April 29, 1997

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 50-530/97-07-03

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/97-07 and the Notice of Violation (NOV) dated March 31, 1997. 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.

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

Sincerely,

JML/AKK/DRL

Enclosures:

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

cc: E. W. Merschoff
J. W. Clifford
K. E. Johnston
K. E. Perkins

9705050110 970429
PDR ADOCK 05000528
Q PDR

11/1
Iles



ENCLOSURE 1

RESTATEMENT OF NOTICE OF VIOLATION 50-530/97-07-03

NRC INSPECTION CONDUCTED MARCH 10 THROUGH

MARCH 14, 1997

INSPECTION REPORT No. 50-528/529/530/97-07



RESTATEMENT OF NOTICE OF VIOLATION 50-530/97-07-03

During an NRC inspection conducted on March 10-14, 1997, 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:

10 CFR 20.1003 defines a radiation area as an area accessible to individuals in which radiation levels could result in an individual receiving a dose equivalent in excess of 5 millirem in 1 hour at 30 centimeters from the radiation source or from any surface that the radiation penetrates.

10 CFR 20.1902 (a) requires that radiation areas be posted with a conspicuous sign or signs bearing the radiation symbol and the words "CAUTION RADIATION AREA."

Contrary to the above, on March 12, 1997, the inspector identified that the Unit 3 fuel building west stairway leading to the 140 foot elevation, which involved radiation levels of 10 millirem per hour at 30 centimeters, was not posted as "Caution Radiation Area" from March 4-12, 1997.

This is a Severity Level IV violation (Supplement IV) (530/9707-03).



ENCLOSURE 2

REPLY TO NOTICE OF VIOLATION 50-530/97-07-03

NRC INSPECTION CONDUCTED MARCH 10 THROUGH

MARCH 14, 1997

INSPECTION REPORT Nos. 50-528/529/530/97-07



REPLY TO NOTICE OF VIOLATION 50-530/97-07-03

Reason For The Violation

Prior to February 28, 1997, the 100' and 140' elevations of the Unit 3 Fuel Building were considered radiation areas. Access points to these areas, including the west stairwell, were properly posted as "Caution Radiation Area". This is best understood (envisioned) as two radiation area islands connected by a non-radiation area stairwell (west). This west stairwell connects the 140' to the 100' and nothing else.

Incident investigators determined that on February 28, 1997, Radiation Protection (RP) personnel removed an apparent extra posting on the 140' west stairwell while failing to identify and remove the 100' west stairwell posting. The investigators found that RP personnel envisioned, with the removal of the apparent extra posting, one large radiation area consisting of the 100', 140' and the connecting west stairwell.

On March 12, 1997, an NRC inspector identified the 100' west stairwell radiation area posting with no posting at the connecting 140' elevation. Under this condition, a worker ascending the west stairwell, starting at the 100' elevation, would conclude that they had exited one radiation area island, were climbing a non-radiation area stairwell and would arrive at a 140' non-radiation area even though the 140' was actually a radiation area. This created an unposted access point to the 140' radiation area.



Following NRC identification, the 100' west stairwell radiation area posting was removed which resulted in a configuration of one large radiation area; the 100', 140' and the connecting stairwell.

The root cause of this event is attributed to personnel error due to a lack of attention to detail which occurred on February 28, 1997 when RP personnel failed to identify and remove the radiation area posting at the 100' of the Unit 3 Fuel Building west stairwell.

Corrective Steps That Have Been Taken and Results Achieved

Upon identification, the additional radiation area posting located on the 100' elevation of the Unit 3 Fuel Building was promptly removed resulting in compliance with 10 CFR 20.1902(a) requirements.

Discussions on this event were held with RP personnel during shift turnover meetings on March 13, 1997.

Corrective Steps That Will Be Taken To Avoid Further Violations

This event, the importance of attention to detail and considering adjacent areas when performing posting changes will be covered with RP personnel during upcoming quarterly training.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 12, 1997 when the additional radiation area posting was removed.

