



Palo Verde Nuclear
Generating Station

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102-03976 - JML/AKK/DRL
July 18, 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 Emergency Plan Exercise Weaknesses
50-528/529/530/9710-01 and 50-528/529/530/9710-02**

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/9710 dated June 24, 1997. Pursuant to your request to provide your office with a description of the corrective measures and a schedule for completing these actions, APS' response is enclosed. The additional performance issues discussed in the Inspection Report will be evaluated under the APS Corrective Action program.

Should you have any further questions, please contact Ms. Angela K. Krainik, Department Leader, PVNGS Nuclear Regulatory Affairs, at (602) 393-5421.

Sincerely,

JML/AKK/DRL

Enclosures:

Reply to Emergency Plan Exercise Weaknesses

47072-90194



Reply to Emergency Plan Exercise Weaknesses
50-528/529/530/9710-01 and 50-528/529/530/9710-02

1. 50-528/529/530/9710-01 Weakness

The failure to promptly recognize and declare the notification of unusual event was identified as an exercise weakness.

Event Description

During the 1997 Palo Verde Nuclear Generating Station (PVNGS) biennial emergency exercise, an emergency action level (EAL) was reached at 0815 hours. At this time, the EAL required the event to be classified within fifteen (15) minutes as a notification of unusual event (NUE) by the Shift Supervisor. At approximately 0834 hours, the Control Room Exercise Controller gave the exercise contingency message to the Shift Supervisor. The NUE declaration was subsequently made at the same time, 0834 hours, by the Shift Supervisor.

APS remains confident, as discussed in the Inspection Report, that during an actual event the information about the impending emergency classification would have been provided during the shift turnover. The classification would not have been missed or delayed without the artificiality posed by the exercise scenario.

The cause of failure to promptly recognize and declare the notification of unusual event is determined to be: a) the artificiality of the exercise scenario, and; b) personnel error by the Shift Supervisor for failing to remove himself from the immediate operation of the plant and follow procedural and training guidance.

Corrective Actions to Prevent Recurrence

1. The Emergency Plan exercise scenario development process will be revised to ensure a credible and logical sequence of events. This action is expected to be complete no later than September 26, 1997.
2. As an interim action, the Emergency Coordinator/Emergency Plan training conducted during the NLR97-02 training cycle included a description of the failure to classify the event in the required time during the exercise. (complete)



2. Emergency Services will revise procedure 16DP-0EP17, "Emergency Operations Facility Actions" to clarify the process for communicating a PAR to offsite agencies. This action is expected to be complete no later than August 29, 1997.
3. Emergency Services will complete revision 19 of the PVNGS Emergency Plan to clarify the process for communicating a PAR to offsite agencies and to clarify the block diagram which illustrates that process. This action is expected to be complete no later than August 29, 1997.



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AUTH. NAME AUTHOR AFFILIATION
LEVINE, J.M. Arizona Public Service Co. (formerly Arizona Nuclear Power
RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 970624 ltr re violations noted in insp repts
50-528/97-10, 50-529/97-10 & 50-530/97-10. Corrective actions:
will revise Emergency Plan exercise scenario development
process to ensure credible & logical sequence of events.

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Sincerely,

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Enclosures:

Reply to Emergency Plan Exercise Weaknesses

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Reply to Emergency Plan Exercise Weaknesses
50-528/529/530/9710-01 and 50-528/529/530/9710-02
Page 2

cc: E. W. Merschoff
K. E. Perkins
B. Murray
K. M. Thomas
F. L. Brush
G. M. Good



ENCLOSURE 1

**REPLY TO EMERGENCY PLAN EXERCISE WEAKNESSES
50-528/529/530/9710-01 and 50-528/529/530/9710-02**

**NRC INSPECTION CONDUCTED MAY 20 THROUGH
MAY 23, 1997**

INSPECTION REPORT No. 50-528/529/530/97-10



Reply to Emergency Plan Exercise Weaknesses
50-528/529/530/9710-01 and 50-528/529/530/9710-02

1. 50-528/529/530/9710-01 Weakness

The failure to promptly recognize and declare the notification of unusual event was identified as an exercise weakness.

Event Description

During the 1997 Palo Verde Nuclear Generating Station (PVNGS) biennial emergency exercise, an emergency action level (EAL) was reached at 0815 hours. At this time, the EAL required the event to be classified within fifteen (15) minutes as a notification of unusual event (NUE) by the Shift Supervisor. At approximately 0834 hours, the Control Room Exercise Controller gave the exercise contingency message to the Shift Supervisor. The NUE declaration was subsequently made at the same time, 0834 hours, by the Shift Supervisor.

APS remains confident, as discussed in the Inspection Report, that during an actual event the information about the impending emergency classification would have been provided during the shift turnover. The classification would not have been missed or delayed without the artificiality posed by the exercise scenario.

The cause of failure to promptly recognize and declare the notification of unusual event is determined to be: a) the artificiality of the exercise scenario, and; b) personnel error by the Shift Supervisor for failing to remove himself from the immediate operation of the plant and follow procedural and training guidance.

Corrective Actions to Prevent Recurrence

1. The Emergency Plan exercise scenario development process will be revised to ensure a credible and logical sequence of events. **This action is expected to be complete no later than September 26, 1997.**
2. As an interim action, the Emergency Coordinator/Emergency Plan training conducted during the NLR97-02 training cycle included a description of the failure to classify the event in the required time during the exercise. **(complete)**



3. During Operations training cycle NLR97-02, the Operations Training Section Leader discussed with the affected Shift Supervisor the performance issue of recognition and classification of emergency events. (complete)
4. Nuclear Licensed Operator Continuing Training (LOCT) evaluated training documentation from the NLR97-01 training cycle to determine if a negative trend in determination and classification of emergency events exists. No negative trend was identified. (complete)

2. **50-528/529/530/9710-02 Weakness**

The failure to notify state and county emergency management agencies of a change in protective action recommendations was identified as an exercise weakness.

Event Description

During the 1997 Palo Verde Nuclear Generating Station (PVNGS) biennial emergency exercise, a protective action recommendation (PAR) was issued at approximately 1319 hours due to escalating conditions. The Emergency Operations Director (EOD) used the Operations Voice ringdown circuit #1 to contact the state Emergency Operations Center (EOC) as expected by the state and county officials. The PAR was to evacuate the five mile radius and shelter out to ten miles in sectors G, H and J. This PAR was not associated with a change in emergency classification, therefore the notification alert network (NAN) was not used. The protective actions were taken in a timely manner.

The cause of failure to notify off-site agencies via the NAN is due to conflicts and incomplete Emergency Plan and implementing procedure guidance in defining expectations and means for transmittal of a PAR not associated with initial and/or subsequent emergency classifications.

Corrective Actions to Prevent Recurrence

1. Emergency Services will revise procedure 16DP-0EP14, "Satellite Technical Support Center Actions", to clarify the process for communicating a PAR to offsite agencies. This action is expected to be complete no later than August 29, 1997.



2. Emergency Services will revise procedure 16DP-0EP17, "Emergency Operations Facility Actions" to clarify the process for communicating a PAR to offsite agencies. **This action is expected to be complete no later than August 29, 1997.**
3. Emergency Services will complete revision 19 of the PVNGS Emergency Plan to clarify the process for communicating a PAR to offsite agencies and to clarify the block diagram which illustrates that process. **This action is expected to be complete no later than August 29, 1997.**

