

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9710170031 DOC. DATE: 97/10/10 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 AUTHOR AFFILIATION
 LEVINE, J. M. Arizona Public Service Co. (formerly Arizona Nuclear Power
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 970912 ltr re violations noted in insp repts
 50-528/97-15, 50-529/97-15 & 50-530/97-15 respectively.
 Corrective actions: responsible engineer coached on
 procedural use & adherence.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTTR 1 ENCL 1 SIZE: 7
 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	THOMAS, K	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

102-04030 - JML/AKK/DLK
October 10, 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 50-529/97-15-03**

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/97-15 and the Notices of Violation (NOV) dated September 12, 1997. APS agrees that the report accurately reflects our corrective actions and position relative to NOV "A" and accepts the option of not responding to the violation. Pursuant to the provisions of 10 CFR 2.201, APS' response to NOV "B" is enclosed. Enclosure 1 to this letter is a restatement of NOV "B." 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/DLK/mah

Enclosures

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

cc: E. W. Merschoff
K. E. Perkins
K. M. Thomas
J. H. Moorman

9710170031 971010
PDR ADOCK 05000528
Q PDR





ENCLOSURE 1

RESTATEMENT OF NOTICE OF VIOLATION "B"
50-529/97-15-03

NRC INSPECTION CONDUCTED JULY 27 THROUGH
SEPTEMBER 6, 1997

INSPECTION REPORT NO. 50-528/529/530/97-15



RESTATEMENT OF NOTICE OF VIOLATION "B" (50-529/97-15-03)

During an NRC inspection conducted on July 27 through September 6, 1997, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, violation "B" is listed below. (Note - No response to Violation "A" is required.)

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 procedural adherence.

Procedure 01DP-OAP01, "Procedure Process," Revision 4, Step 7.2, required, in part, that procedure users are responsible for adhering to the requirements of the procedure.

Contrary to the above, on July 23, 1997, licensee personnel failed to adhere to the requirements of Procedure 70TI-9SP03, Chemical Passivation Of Spray Pond Piping, Revision 0. Specifically, Step 4.2 which required the control room supervisor/shift supervisor to be briefed on the test procedure and that the work group obtain permission to proceed with the test. These requirements were not performed. Also, Step 5.8, which required a pretest briefing to be conducted, was not performed.

This is a Severity Level IV violation (Supplement 1) 50-529/97-15-03.



ENCLOSURE 2

REPLY TO NOTICE OF VIOLATION "B"
50-529/97-15-03

NRC INSPECTION CONDUCTED JULY 27 THROUGH
SEPTEMBER 6, 1997

INSPECTION REPORT NO. 50-528/529/530/97-15



REPLY TO NOTICE OF VIOLATION "B" (50-529/97-15-03)

Reason For The Violation

On July 23, 1997, temporary piping was installed by divers in the Unit 2 spray pond. The procedure used to install the temporary piping was test and inspection procedure 70TI-9SP03, "Chemical Passivation of Spray Pond Piping." The prerequisite and initial condition sections of 70TI-9SP03 included individual signoffs for obtaining Shift Supervisor authorization and performing a prejob briefing. The Project Manager discussed the test plan with the Work Control Senior Reactor Operator and afterwards briefed the diving crew; however, the engineer responsible for conducting the test did not contact the Shift Supervisor and obtain authorization nor did he conduct and document a thorough prejob briefing with all appropriate personnel. Failing to notify the Shift Supervisor and conduct a thorough prejob briefing resulted in missed opportunities to prevent events that compromised the personal safety of the divers. Specifically, a valve that was being used as a safety boundary during installation of the temporary piping was cycled open while divers were in the spray pond and unmonitored service air was used by some divers as a breathing air source during diving operations. Failing to complete the prerequisite and initial conditions of 70TI-9SP03 prior to installing the temporary piping in the spray pond was contrary to approved station procedures and was a violation of Technical Specification 6.8.1.



Palo Verde's significant investigations of the event determined the reason for the violation was poor work practices on the part of the responsible engineer. A contributing factor was poor communications between operations, engineering, maintenance, and scheduling.

Corrective Steps That Have Been Taken and Results Achieved

Significant investigations were performed in accordance with Palo Verde's corrective action program. Based on the results of the investigations, the responsible engineer was coached on procedural use and adherence.

Corrective Steps That Will Be Taken To Avoid Further Violations

A newsletter will be issued by strategic communications on procedure use and adherence and procedure implementation, including responsibilities for impact reviews and training for affected personnel by October 30, 1997.

Training will be provided to all engineering support personnel on procedure use and adherence, procedure preparation and implementation, including responsibilities for impact reviews and training for affected personnel by January 31, 1998

Date When Full Compliance Will Be Achieved

Full compliance was achieved on July 23, 1997 after the first phase of temporary piping was installed and 70TI-9SP03 suspended. On September 12, 1997, prior to continuing work under 70TI-9SP03, a thorough prejob briefing was conducted and the Shift Supervisor's authorization was obtained.

