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SUBJECT: Forwards response to violations noted insp repts
50-528/97-22, 50-529/97-22 & 50-530/97-22. Corrective actions:
fuel movement stopped when CR notified of dilution of spent
fuel pool.

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102-04035 - JML/AKK/REB
November 6, 1997

U. S. Nuclear Regulatory Commission
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Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 2
Docket No. STN 50-529
Reply to Notice of Violation 50-529/97-22-01.**

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/97-22 and the Notice of Violation (NOV) dated October 8, 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.

Inter-departmental communication, particularly to the Control Room, is critical to safe and smooth operation of PVNGS. We are addressing the recent examples where poor communication was a contributor to plant events. The PVNGS Sensitive Issues Manual, a tool for setting management's expectations for communication during work activities, has been revised to include fuel movement and other activities in the spent fuel pool, as well as onsite diving activities, to ensure that Operations is appropriately notified. Relatedly, an evaluation is ongoing to assess the interface between Work Control and the Control Room, and a plan is being developed to assess site scheduling. These actions are being performed to ensure that the Control Room is informed of activities ongoing in the plant and is able to assess the interaction and potential impact of work activities on safe plant operation.

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G PDR

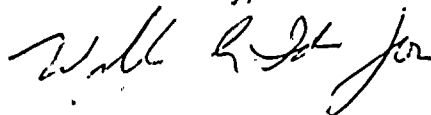




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Reply to Notice of Violation 50-529/97-22-01
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Should you have any further questions, please contact Ms. Angela K. Krainik at (602) 393-5421.

Sincerely,



JML/AKK/REB/rlh

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



ENCLOSURE 1

**RESTATEMENT OF NOTICE OF VIOLATION
50-529/97-22-01**

**NRC INSPECTION CONDUCTED SEPTEMBER 8 THROUGH
SEPTEMBER 12, 1997**

INSPECTION REPORT NO. 50-528/529/530/97-22

RESTATEMENT OF NOTICE OF VIOLATION (50-529/97-22-01)

During an NRC inspection conducted on September 8 - 12, 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 violations are listed below:

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, Appendix A, Revision 2, Section 9, requires that maintenance that can affect the performance of safety-related equipment should be performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

Design Change Document DMWO 00793132, Revision 01, states, in Part II, "Other Design Input Considerations," Section 1, "Dismantling and Rearranging of Existing Items," that [m]ovement or handling of fuel in the spent fuel pool must be suspended while the installation activities take place."

Contrary to the above, on July 11, 1997, Work Order 00793132 was approved but it did not include the requirement from the design change document (DMWO 00793132) that "[m]ovement or handling of fuel in the spent fuel pool must be suspended while the installation activities take place." Consequently, during the August 12, 1997, installation of the modification, movement and handling of fuel in the spent fuel pool was underway during the boron dilution event.

This is a Severity Level IV violation (Supplement 1) (50-529/9722-01).



ENCLOSURE 2

**REPLY TO NOTICE OF VIOLATION
50-529/97-22-01**

**NRC INSPECTION CONDUCTED SEPTEMBER 8 THROUGH
SEPTEMBER 12, 1997**

INSPECTION REPORT NO. 50-528/529/530/97-22

REPLY TO NOTICE OF VIOLATION (50-529/97-22-01)

Reason For The Violation

The document which contained the statement that "[m]ovement or handling of fuel in the spent fuel pool must be suspended while the installation activities take place." was the Design Input Review Checklist (DIRC) for the design modification work order (DMWO). The checklist was intended to be used as a reference for the review/verification of the DMWO text to ensure that all the necessary items were addressed in the DMWO. The engineer who prepared the DIRC was aware of and was involved in multi-discipline meetings where it had been agreed that fuel movement would not be performed during the time the gate seal was depressurized. He therefore thought the issue of fuel movement had been adequately addressed and did not ensure the statement from the DIRC was included in the DMWO.

During the modification installation, when plant conditions changed, new fuel movement was allowed to occur. The subsequent dilution of the SFP, as a result of the deflated seal, did not result in an entry into a technical specification action statement associated with fuel movement.

Corrective Steps That Have Been Taken and Results Achieved

Fuel movement was stopped when the control room was notified of a dilution of the spent fuel pool and was not allowed to resume until the gate seal was pressurized.



This effectively implemented the requirement that had been omitted from the work order. In addition, the control room operators verified compliance with the technical specification related to boron concentration for moving fuel in the spent fuel pool and entered the LCO for borated water sources.

Corrective Steps That Will Be Taken To Avoid Further Violations

1. The plant change work orders to install the gate modification in Units 1 and 3 will be revised to contain the appropriate information from the DMWO (including the DIRC) prior to deflating the gate seals.
2. The cask pit in Units 1 and 3 will be borated prior to deflating the gate seal for the modification installation.
3. The procedure for Design and Technical Control will be revised to clarify that relevant information in the DIRC is to be included in the DMWO text by 4/30/98.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on August 12, 1997 when fuel movement was stopped as a result of the spent fuel pool dilution.

