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AUTH.NAME	AUTHOR AFFILIATION
ZELL, L.C.	Arizona Public Service Co. (formerly Arizona Nuclear Power
RECIP.NAME	RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 980710 ltr re violations noted in investigation repts 4-97-022S & 4-1998-014. Corrective actions: conducted presentations & discussions of incident w/Palo Verde SRO licensed personnel & personnel in training.

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Leo C. Zell
Arizona Public Service Company
PO Box 52034, MS 7605
Phoenix, Arizona 85072-2034

August 6, 1998

US Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Reference: NRC letter dated July 10, 1998, NOTICE OF VIOLATION (NRC
Investigation Report Nos. 4-97-022S and 4-1998-014)

Dear Sirs:

**Subject: REPLY TO A NOTICE OF VIOLATION (IA 98-016, Docket No. 55-
50234, License No. SOP-50274-1)**

Enclosed is my response to the Notice of Violation sent under your cover letter
dated July 10, 1998.

Sincerely,



Leo C. Zell

cc: Regional Administrator
US Nuclear Regulatory Commission, Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011

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PDR - ADDCK 05000528
G PDR

REPLY TO A NOTICE OF VIOLATION

This will respond to the Notice of Violation ("NOV") sent under your cover letter of July 10, 1998.

The reason for the violation, the corrective steps taken, and the corrective steps taken to avoid further violations have been previously addressed in my testimony to the Office of Investigations, in my testimony and written statements provided to the Nuclear Regulatory Commission ("NRC") at the March 31, 1998 Arizona Public Service Company ("APS") pre-decisional enforcement conference, in statements I have made to APS during its investigation into this matter, and in a statement I provided to the NRC on April 15, 1998. I respectfully refer the NRC to these materials in response to the NOV.

Attached hereto is a redacted copy of my April 15, 1998 Declaration, which has previously been provided to the NRC in unredacted form. I request that the redacted portions of my April 15 Declaration be withheld from the copy placed in the Public Document Room. The redactions relate to my salary information and other personal details of the disciplinary action that APS has taken against me. This is highly personal and private information that should not be made public.

Finally, in further response to the NOV, I have now completed additional corrective actions relating to this matter. In particular, I have conducted presentations and discussions of this incident with Palo Verde SRO licensed personnel and personnel in training to obtain RO and SRO licenses. These presentations were completed July 31, 1998. I have also conducted similar presentations with personnel from the following departments: Nuclear Regulatory Affairs, Nuclear Training, Procurement, Financial, Fire Protection and Outage/Scheduling. Making these presentations has had a large impact on me. Moreover, based upon the feedback I have received, these briefings have had a powerful impact on those who have attended them. The briefings have permitted others to learn from our mistake better than any other method of communication could possibly have done. The presentations that we have planned have been concluded; however, we will continue to give presentations if they are requested in the future. In sum, the corrective actions related to this matter have been completed.

I declare under penalty of perjury that the foregoing is true and correct.

August 6, 1998


Leo Charles Zell

