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 RYAN, S.W. 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 insp repts
 4-97-022S & 4-98-014. Corrective actions: steps taken to
 address NOV were stated in presentation at 980331
 predecisional enforcement conference.

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Arizona Public Service Co.
P.O. Box 52034, M.S. 7050
Phoenix, Arizona 85072-2034

August 4, 1998

ID # 471-00526-SSB/SWR

U. S. Nuclear Regulatory Commission
ATTN.: Document Control Desk
Washington, D.C. 20555

Subject: Reply to a Notice of Violation (NRC Investigation Report Nos. 4-97-022S and 4-1998-014)

To whom it may concern:

I am submitting this response in compliance with NRC letter IA 98-015 dated July 10, 1998 and the associated Notice of Violation Re: the investigation reports noted above. I have been requested to respond to four specific aspects of the violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved.

This letter refers to and relies on material previously presented to the NRC in my interview with OI and my presentation at the March 31, 1998 predecisional enforcement conference held in Arlington, Texas.

1. Reasons for The Violation

I do not contest the violation. Further, I deeply regret my involvement in the incident leading to the NOV. I believe my previous testimony and correspondence, as set forth in the materials referred to above, have provided a complete and accurate accounting as to my recollections for the reasons behind this violation. To avoid being redundant I rely on the information already provided to the NRC to address the reasons for the violation.

2. Corrective Steps and Results

The corrective steps taken to address the NOV were stated in my presentation at the March 31, 1998 predecisional enforcement conference. The detail conditions of the corrective action steps have not changed and therefore to discuss them again would only be redundant. I have completed preparation and delivery of formal presentations and discussions regarding this incident with site personnel in the following departments: Site Maintenance, Site Chemistry, Site Engineering, Procurement and Supply, Water Reclamation, and Operations Support. With regard to the results

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achieved through the corrective measures, this incident and its repercussions continue to act as a constant reminder of my error in judgment as well acting to continually reinforce my obligation to fully discharge my duties in accordance with regulatory requirements when acting as an employee in the nuclear industry and more specifically as a licensed operator. I have received numerous notes of feedback regarding the presentations made to plant personnel, indicating the presentations have had a profound impact on plant personnel in a way no other presentation regarding personal integrity and documentation requirements ever has. I believe hearing directly from and talking to the individuals involved has had a much greater positive influence than a simple third party presentation could possibly achieve.

3. Steps to Avoid Further Violations

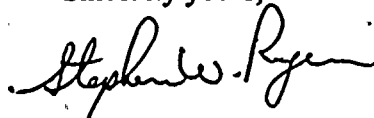
The steps for my remediation outlined in my presentation at the March 31, 1998 predecisional enforcement conference have had a profound effect on me and will continue to have that effect for the rest of my working life. These steps collectively serve to ensure that I will never knowingly be involved in any violation, deliberate or otherwise, ever again. Additionally, as noted in Mr. Merschoff's letter of July 10, 1998, should I ever reapply for Part 55 licensed-operator status, my application must address and will face review under 10 CFR§55.31(b).

4. Full Compliance

All measures specified in my plan for remediation as presented at the March 31, 1998 predecisional enforcement conference, other than those specific to the APS disciplinary policies and actions that are in effect for a year or more, are complete. The remainder of the disciplinary actions will be completed by February 10, 2000. Mr. Merschoff's letter of July 10 indicates that the Commission regards these measures to be sufficient. Thus, I believe that from the Commission's standpoint, and to the extent that this concept can be applied to an individual enforcement action, full compliance has been achieved.

I will be pleased to respond to any further questions you may have.

Sincerely yours,

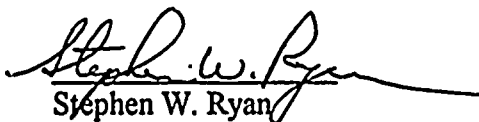


Stephen W. Ryan
Maintenance Senior Advisor
Arizona Public Service Co.

AFFIRMATION OF STEPHEN W. RYAN

County of Maricopa
State of Arizona)

I hereby swear, under penalty of perjury, that the statements I have made in this letter are true and correct.


Stephen W. Ryan

Subscribed and sworn to before me this 4th day of August, 1998


Notary Public
My commission expires: June 2, 2002

OFFICIAL SEAL
STACEY LOVELESS
Notary Public - State of Arizona
MARICOPA COUNTY
My Comm. Expires June 2, 2002

cc: Regional Administrator
U. S. Nuclear Regulatory Commission, Region IV
611 Ryan Plaza Dr. Suite 400
Arlington, Texas 76011-8064

