

Arizona Public Service Company

P.O. BOX 21666 • PHOENIX, ARIZONA 85036

July 14, 1983

ANPP-27302-BSK/RQT

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U. S. Nuclear Regulatory Commission  
Region V  
Creekside Oaks Office Park  
1450 Maria Lane - Suite 210  
Walnut Creek, CA 94596-5368

Attention: Mr. D. M. Sternberg, Chief  
Reactor Projects Branch 1

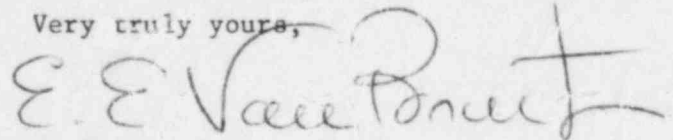
Subject: Final Report - DER 83-13  
A 50.55(e) Reportable Condition Relating to APS Crews  
Inadvertently Did Work Violating Requirements On  
Tagged-Out Cable Terminations.  
File: 83-019-026; D.4.33.2

Reference: A) Telephone Conversation between A. D'Angelo and  
R. Tucker on March 11, 1983  
B) ANPP-23427, dated April 5, 1983 (Interim Report)  
C) ANPP-24076, dated June 15, 1983 (Time Extension)

Dear Sir:

Attached is our final written report of the deficiency referenced above,  
which has been determined to be Not Reportable under the requirements of  
10CFR50.55(e).

Very truly yours,



E. E. Van Brunt, Jr.  
APS Vice President,  
Nuclear Projects Management  
ANPP Project Director

EEVB/RQT:ru

Enclosure

cc: See Page 2

U. S. Nuclear Regulatory Commission  
Page 2

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U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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FINAL REPORT - DER 83-13  
DEFICIENCY EVALUATION 50.55(e)  
ARIZONA PUBLIC SERVICE COMPANY (APS)  
PVNGS UNIT 1

I. Description of Condition

A jurisdictional boundary condition was identified wherein APS Maintenance/Operations used Test Exception Reports (TER's) and APS Work Implementation Documents (work orders) to complete major work items typically completed by Construction via Startup Turnback Work Orders. The TER's and APS work orders were issued by Startup to have incomplete construction items finished by APS Maintenance rather than turn the subsystems back to Construction. This condition is not a jurisdictional boundary problem per se since no regulations exist restricting APS Maintenance from performing the completion of the major work items. However, APS Maintenance did not use the applicable Bechtel Construction Work Plan Procedure/Quality Control Instructions (WPP/QCI's), which provide instructions for the proper documentation of completed work to satisfy as-built tracking requirements, because the use of Bechtel Construction Work Procedures had not been implemented by APS Maintenance into their system.

APS Quality Assurance Stop Work Notice No. S-83-006 was issued to stop all work of this type. Per the Stop Work Notice, the specified corrective action requires adequate procedures, documentation and training to assure that the work performed by APS Maintenance would be performed in accordance with established site construction procedures and installation specifications. This Deficiency Evaluation Report was initiated to evaluate whether any of the work completed would impair the function of any safety related systems or equipment and to specify any necessary corrective action.

The referenced Stop Work Notice and subsequently issued Corrective Action Request (APS CAR 0-83-010N) identified the following required corrective actions:

1. Recall all APS work orders from the field that were generated to perform construction items.
2. Perform a documented review of all work orders and TER's that have been written to complete construction open items to ensure that adequate construction documentation (per applicable WPP/QCI's) has been supplied to BPC Construction for retention on DDCC as required.
3. Conduct training for personnel responsible for implementing procedures, WPP/QCI's and project construction specifications.

## II. Analysis of Safety Implications

As documented by the referenced Corrective Action Request, all of the work previously completed by Maintenance was reinspected by qualified personnel for adequacy of installation and all were found to be acceptable. The WPP/QCI's referred to above provide instructions related to proper completion of documentation associated with the work performed. The only documentation omissions found were associated with proper completion of EE-580 Termination Cards; however, these omissions have no direct bearing on the safe operation of the plant. Thus, if left uncorrected, this condition would not adversely affect the safety of operations of the plant during the lifetime of the plant and is therefore not reportable under the requirements of 10CFR50.55(e)

## III. Corrective Action

1. To preclude recurrence, training on Bechtel WPP/QCI use and the APS Work Control Procedure 30AC-9ZZ01 (which also provides instructions for proper documentation of completed work) has been held by APS Maintenance/Operations and training will continue as committed by APS CAR 0-83-010N response. The Work Control Procedure has been revised to reference applicable Bechtel WPP/QCI's.
2. All Electrical, instrument and controls (I & C) and mechanical work orders in the field have been reviewed as required. Documentation of this review is being retained by APS.
3. Of the completed I & C and mechanical work orders that were received, none were found that required completion documentation. Completed electrical work orders (123 total) that have been reviewed have had all the necessary documentation completed.
4. The referenced Stop Work Notice and Corrective Action Request have been completed and accepted by APS Quality Assurance.