

Arizona Public Service Company

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102-02477-WFC/TRB/JJN

April 15, 1993

WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-37
Washington, DC 20555

Reference: Letter dated March 22, 1993, from Robert J. Pate, Chief Safeguards, Emergency Preparedness, and Non Power Reactor Branch, NRC, to W. F. Conway, Executive Vice President, Nuclear, APS

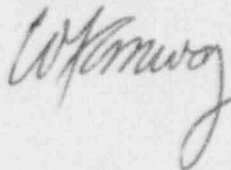
Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Notice of Violation 50-528/93-05-03
File: 93-070-026

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/93-05, and the Notice of Violation, dated March 22, 1993. Pursuant to the provisions of 10 CFR 2.201, APS' response is enclosed. Enclosure 1 to this letter is a restatement of the Notice of Violation. APS' response is provided in Enclosure 2.

Should you have any questions, please call Thomas R. Bradish at (602) 393-5421.

Sincerely,



WFC/TRB/JJN/rv

Enclosures:

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

cc: J. B. Martin

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ENCLOSURE 1

RESTATEMENT OF NOTICE OF VIOLATION 50-528/93-05-03

NRC INSPECTION CONDUCTED

JANUARY 25, 1993 THROUGH JANUARY 29, 1993

AND

FEBRUARY 11, 1993 THROUGH FEBRUARY 12, 1993

INSPECTION REPORT NOs. 50-528/529/530/93-05

RESTATEMENT OF NOTICE OF VIOLATION 50-528/93-05-03

During an NRC inspection conducted on January 25-29, and February 11-12, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C, the violation is listed below:

Paragraph 2.E. of the Facility Operating License No. NPF-41 for Palo Verde Nuclear Generating Station requires the licensee to fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans, including all amendments to those plans made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55, and pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

Section 3.1.2. of the licensee's approved Security Plan describes in part the design and specifications of the protected area perimeter fence and requires that this fence provide "assurance of no intruder penetration."

Contrary to the above, as of February 11, 1993, the protected area perimeter fence failed to provide assurance of no intruder penetration in that the bottom of a fence section was capable of being raised to a height of eleven inches.

This is a Severity Level V violation (Supplement III).

ENCLOSURE 2

REPLY TO NOTICE OF VIOLATION 50-528/93-05-03

NRC INSPECTION CONDUCTED

JANUARY 25, 1993 THROUGH JANUARY 29, 1993

AND

FEBRUARY 11, 1993 THROUGH FEBRUARY 12, 1993

INSPECTION REPORT NOs. 50-528/529/530/93-05

REPLY TO NOTICE OF VIOLATION 50-528/93-05-03

Reason For The Violation

The PVNGS perimeter fence consists of both an inner and outer fence separated by approximately twenty feet. Both fences are inspected concurrently while walking between the fences. If the fencing appears to be deficient during the inspection, then the it is tested in accordance with the testing procedure 20SP-0SK09, "Security System Testing". This testing was usually performed by the individual performing the inspection. Therefore, the outer fence was usually tested from the inside.

The fence is secured at several locations on the outside of the pole. When the fence was tested from the inside, the poles restricted the lateral movement of the fence. When the fence was tested from the outside, the poles did not provide the additional lateral restriction. The reason for the violation was the failure to recognize that the fencing should be tested from the unrestricted side and to establish an adequate testing procedure.

Corrective Steps That Have Been Taken And Results Achieved

On February 15, 1993, the outer fence was inspected, and three areas of the fence required corrective actions. Compensatory posts were established for these areas until the corrective actions, consisting of additional hardware restraints were completed.

The procedure, 20SP-0SK09, was revised to require testing of the outer fence from the outside.

Corrective Steps That Will Be Taken to Avoid Further Violations

The corrective steps taken above are expected to avoid further violations.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on February 15, 1993, when the fence was inspected and compensatory measures were taken.