

Arizona Public Service Company

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102-02485-WFC/TRB/DLK

April 23, 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: 1) Letter dated March 11, 1993, from L. F. Miller, NRC, to W. F. Conway, APS, "Response to Arizona Public Service Company Reply to Notice of Violations 50-528, 529, 530/92-36-01, 50-530/92-36-03, and 50-528/92-36-04"

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Reply to Notice of Violation 50-530/92-36-03 Example 1
File: 93-070-026

Arizona Public Service Company (APS) has reviewed the referenced letter, and APS' response is enclosed. Enclosure 1 to this letter is a restatement of the Notice of Violation. APS' response is provided in Enclosure 2. The due date for this response was extended from April 10, 1993, to April 23, 1993, during a telephone conversation with Mr. W. Ang on April 9, 1993.

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

Sincerely,

James M. Levine for WFC

WFC/TRB/DLK/rv

Enclosures:

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

cc: J. B. Martin
J. A. Sloan

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ENCLOSURE 1

RESTATEMENT OF NOTICE OF VIOLATION

50-530/92-36-03, EXAMPLE 1

NRC INSPECTION CONDUCTED OCTOBER 19 - NOVEMBER 6, 1992

INSPECTION REPORT NOs. 50-528, 529, AND 530/92-36

RESTATEMENT OF NOTICE OF VIOLATION 50-530/92-36-03, EXAMPLE 1

During an NRC inspection conducted during the weeks of October 19, and November 2, 1992, a violation of NRC requirements was identified. The violation, as originally issued, contained two examples. In accordance with Reference 2, only Example 1 is listed below.

Violation 50-530/92-36-03, Example 1 Corrective Action

10 CFR Part 50, Appendix B, Criterion XVI states in part that, "Measures shall be established to assure that conditions adverse to quality, such as. . . deviations. . . and nonconformances are promptly identified and corrected."

Section 8.4.2 of Revision 6 of licensee procedure 73TI-9ZZ19 states in part that ". . . (an EER [Engineering Evaluation Request] per 73AC-0EE01 for non-quality related items) shall be initiated for all items reflecting an unacceptable condition."

Section 8.5.2 of Revision 4 of licensee procedure 73TI-9ZZ18 states in part that "For all quality related items reflecting an unacceptable condition an MNCR [Material Non-Conformance Report] per 60AC-0QQ01 should be initiated, and for all non-quality related items an EER [Engineering Evaluation Request] per 73AC-0EE01 should be initiated."

Pacific Valves drawing number 7-509-B (Licensee drawing number P222B-141-4) identified auxiliary feedwater pump AFN-P01 discharge check valve 3PAFN-V012 bonnet cap screws, piece 2, material as ASTM A193, Grade B7.

Contrary to the above:

As of November 2, 1992, an engineering evaluation request was not initiated following licensee identification of unacceptable conditions identified during a visual examination of auxiliary feedwater pump AFN-P01 discharge check valve 3PAFN-V012 per procedure 73TI-9ZZ19 on April 11, 1991. The licensee's examination identified that the internal disc hinge bracket cap screw lock plate tabs were not properly bent up to lock the cap screws in place and the external bonnet cap screws were not ASTM A193, Grade B7 material or equivalent.

This is a Severity Level IV Violation (supplement 1), applicable to Unit 3.

ENCLOSURE 2

REPLY TO NOTICE OF VIOLATION 50-530/92-36-03, EXAMPLE 1
NRC INSPECTION CONDUCTED OCTOBER 19 - NOVEMBER 6, 1992
INSPECTION REPORT NOS. 50-528, 529, AND 530/92-36

REPLY TO NOTICE OF VIOLATION (B) 50-530/92-36-03, EXAMPLE 1

Reason for the Violation

On April 11, 1991, a visual examination was conducted on 3PAFN-V012 by the APS Check Valve Engineer. Two unsatisfactory conditions were identified during the inspection. The unsatisfactory conditions were documented and corrected in accordance with the APS Work Control Program; however, an Engineering Evaluation Request (EER) was not initiated to perform a documented review of the conditions. The Check Valve Engineer believed at the time of the inspection, that since the conditions did not affect the operation of the check valve, documenting and correcting them using the APS Work Control Program, was adequate.

Corrective Actions Taken and Results Achieved

The visual examination procedure, 73TI-9ZZ19, and the administrative control procedure, 73AC-0XI03, have been revised to require a Material Non-Conformance Report, or an EER for Non-Quality Related items, be generated for all rejected inspection blocks on the check valve examination checklist.

This action has been taken to ensure that unacceptable conditions, discovered during a check valve examination, are documented and evaluated. This action will also ensure that

any trends of unacceptable conditions are identified.

Corrective Actions That Will Be Taken To Avoid Further Violations

The corrective actions discussed above, are adequate to avoid further violations.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 13, and March 25, 1993, respectively, when revisions to 73TI-9ZZ19 and 73AC-0XI03 were effective.