

Arizona Public Service Company

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102-02492-WFC/TRB/JJN

April 29, 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 30, 1993, from C. A. VanDenburgh, Chief, Reactor Projects Branch, NRC, to W. F. Conway, Executive Vice President, Nuclear, APS

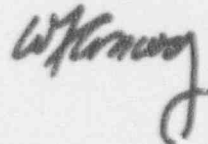
Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Notice of Violation 50-529/93-04-02
File: 93-070-026

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/93-04, and the Notice of Violation, dated March 30, 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
J. A. Sloan

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ENCLOSURE 1

RESTATEMENT OF NOTICE OF VIOLATION 50-529/93-04-02

NRC INSPECTION CONDUCTED

JANUARY 20, 1993 THROUGH FEBRUARY 22, 1993

INSPECTION REPORT NOs. 50-528/529/530/93-04

RESTATEMENT OF NOTICE OF VIOLATION 50-529/93-04-02

During an NRC inspection conducted on January 20, through February 22, 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:

Technical Specification 6.8.1 states that, "Written procedures shall be established, implemented and maintained covering...applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978" Appendix A of Regulatory Guide 1.33 recommends administrative procedures for the plant fire protection program.

Test procedure 14FT-9FP38, "MONTHLY AUTOMATIC WET PIPE SPRINKLER SYSTEM ALARM TEST," Revision 0, step 6.4.1, required that, "The test performer shall maintain communications with the affected unit control room to verify control room alarm annunciation or a fire department member shall be stationed in the affected unit control room to verify control room annunciation." In addition, step 6.2.2.4, required that the test be conducted in accordance with administrative procedure 73AC-OFP01. Step 3.5.7 of procedure 73AC-OFP01, "Fire Protection Test Program," Revision 2.01, required that, "Each procedure step ... shall be performed and initialed as required in sequence"

Contrary to the above, on January 29, 1993, the technician in the performance of procedure 14FT-9FP38: (1) did not maintain communications with the affected unit control room nor was a fire department member stationed in the affected unit control room and control room annunciation was not verified, (2) performed steps 8.14 and 8.16, for valves V707, V734, V690 and V689, prior to performing steps 8.1.3 and 8.1.5, and (3) initialed Section 9.0, "System Restoration," steps 9.1 through 9.5 of the test procedure, prior to performing these steps and prior to completion of the test.

This is a Severity Level IV violation (Supplement 1) applicable to Unit 2.

ENCLOSURE 2

REPLY TO NOTICE OF VIOLATION 50-529/93-04-02

NRC INSPECTION CONDUCTED

JANUARY 20, 1993 THROUGH FEBRUARY 22, 1993

INSPECTION REPORT NOs. 50-528/529/530/93-04

REPLY TO NOTICE OF VIOLATION 50-529/93-04-02

Reason For The Violation

The reason for the violation was personnel error. The technician had been trained regarding the requirement to perform procedure steps sequentially. Nevertheless, the technician believed that performing the procedural steps sequentially was general guidance and that the steps could be performed in a different sequence if the objectives of the test were still being met. The technician intended to verify the visual alarms by observing and acknowledging the alarms upon returning to the control room and to verify the audio alarms with the control room operators.

In the second instance, the technician inadvertently signed the restoration steps. The technician stated the he could not recall having signed the steps nor would he have intentionally signed the steps prior to completing the steps.

Corrective Steps That Have Been Taken And Results Achieved

The individual was counseled regarding procedure compliance, the requirement to perform each procedural step sequentially, and the necessity of attention to detail.

To reemphasize the requirement to perform steps sequentially, fire department personnel were briefed on this requirement. Shift briefings have been subsequently provided to reiterate mandatory compliance with procedural requirements.

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 January 29, 1993, when the steps in the procedure were completed and a late test log entry was made.