

Arizona Public Service Company

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102-02501-WFC/JNI

May 3, 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 April 2, 1993, from L. F. Miller, Jr., Chief, Reactor Safety 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
Reply to Notice of Violation 50-528 and 529/93-09-01
File: 93-019-026; 93-003-726

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/93-09 and the Notice of Violation (NOV) transmitted by the referenced letter dated April 2, 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 contact Thomas R. Bradish at (602) 393-5421.

Sincerely,

W. F. Conway
W F Conway

WFC/JNI/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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STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, E. C. Simpson, represent that I am Vice President - Nuclear Engineering, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority to do so, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true and correct.

E C Simpson
E. C. Simpson

Sworn To Before Me This 3rd Day Of MAY, 1993.

Carl A James
Notary Public

My Commission Expires

MAR 22, 1996

ENCLOSURE 1

RESTATEMENT OF NOTICE OF VIOLATION 50-528 AND 529/93-09-01

NRC INSPECTION CONDUCTED MARCH 1 - MARCH 5, 1993

INSPECTION REPORT Nos. 50-528/529/530/93-09

RESTATEMENT OF NOTICE OF VIOLATION 50-528 AND 529/93-09-01

During an NRC inspection conducted during the week of March 1 through 5, 1993, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is identified below:

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 failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected."

Material Nonconformance Reports (MNCRs) 90-FI-0099 and 90-FI-1403 dispositions required that conduit penetrations through specified fire boundaries, that have low density foam installed, have metal plugs placed on both ends as specified in design drawings.

Contrary to the above, the licensee verified completion of corrective actions by closing MNCR 90-FI-0099, on December 7, 1990, and MNCR 90-FI-1403, on June 24, 1991, when deficiencies had not been corrected as specified in the MNCRs. Specifically, one of four conduit penetrations listed in each MNCR was found to have only one metal cap placed on one end of the conduit penetrations.

This is a Severity Level IV Violation (Supplement 1)

ENCLOSURE 2

REPLY TO NOTICE OF VIOLATION 50-528 AND 529/93-09-01

NRC INSPECTION CONDUCTED MARCH 1 - MARCH 5, 1993

INSPECTION REPORT Nos. 50-528/529/530/93-09

REPLY TO NOTICE OF VIOLATION 50-528 AND 529/93-09-01

Reason for the Violation

The reason for the violation was that the level of detail in the Material Non-Conformance Report (MNCR) deficiency description was not sufficient to develop adequate Work Order instructions. The MNCR deficiency description, the MNCR disposition, and the Work Order instructions, did not clearly identify the need to have plugs installed in both ends of the conduit, and guided the Electricians and the Quality Control Inspector to install and inspect only one end of the embedded conduit sleeves. One end of the Unit 2 conduit was only accessible with scaffolding or ladders, yet the work package did not require scaffolding or ladders. Both ends of the affected Unit 1 conduit required scaffolding or ladders for access, yet the work package required scaffolding for only one end of the conduit. As a result, the individuals involved in the corrective action believed that only one end of the conduits was required to be plugged and inspected.

Corrective Actions Taken and Results Achieved

Condition Report/Disposition Request (CRDR) 930164 was initiated on March 8, 1993, to address the concern that MNCRs 90-FI-0099 and 90-FI-1403 (and the associated Work Orders) were closed without fully correcting the non-conformances. The Incident Investigation Report, action 01 of CRDR 930164, was completed April 14, 1993.

In addition, PVNGS initiated MNCR 93-FP-2027 (Unit 2) on March 3, 1993, and MNCR 93-FP-1030 (Unit 1) on March 4, 1993, to address the non-conforming configurations. MNCR 93-FP-2027 field work was completed by Work Order 573342 on April 15, 1993. MNCR 93-FP-1030 work will be completed by June 25, 1993.

PVNGS performed a 100% visual verification of conduits sealed with threaded plugs (identified during the 1990 surveillance and where the work was accomplished by Unit Maintenance groups) to determine if the non-conformances identified in the NOV were an isolated event. No additional deficiencies were identified during the visual verification.

PVNGS performed a visual verification of a 20% random sample of conduits sealed with threaded plugs (identified during the 1990 and 1991 surveillances and where the work was accomplished by Fire Protection Support Services) to determine if the non-conformances identified in the NOV were an isolated event. No deficiencies were identified during the visual verification.

Corrective Actions That Will Be Taken to Avoid Further Violations

Based on CRDR 930164 Incident Investigation Report, PVNGS will implement the following corrective actions:

PVNGS will establish guidance to be used by Fire Protection Support Services for identifying non-conformances on spare conduit seals. This guidance will consist

of a standard format and content which will provide adequate information to the work planners to prepare appropriate Work Orders to ensure that work on spare conduit penetrations meet the fire protection requirements. PVNGS will revise procedure 14FT-9FP67, as necessary, to provide appropriate guidance in completing MNCRs. This will be completed by November 30, 1993, prior to the next scheduled performance of this surveillance procedure.

PVNGS will brief the Unit Quality Control Inspectors on this event. This will be completed by May 14, 1993.

PVNGS will brief the Unit Planners, Central Maintenance Electrical Planners, and Civil Work Planners on this event. This will be completed by May 28, 1993.

Date When Full Compliance Will Be Achieved

PVNGS established fire watches for all Quality Augmented (QAG) Fire Barriers associated with the 1990 penetration seal surveillance as a conservative compensatory measure on February 22, 1992. Compensatory measures associated with door impairments have required fire watches for these areas since 1987 prior to the MNCRs (90-FI-0099 and 90-FI-1403) being incorrectly closed. Therefore, PVNGS was in full compliance for Units 1 and 2 upon implementing the compensatory measures and will maintain full compliance upon completion of the corrective actions (MNCRs 93-FP-2027 and 93-FP-1030).

PVNGS initiated MNCR 93-FP-2027 (Unit 2) on March 3, 1993, and MNCR 93-FP-1030 (Unit 1) on March 4, 1993, to address the non-conforming configurations. MNCR 93-FP-2027 field work has been completed. MNCR 93-FP-1030 will be completed by June 25, 1993.