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PUBLIC SERVICE COMPANY

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NOS # 82-519

REGION V 154

G. CARL ANDOGNINI
VICE PRESIDENT
ELECTRIC OPERATIONS

June 10, 1982

Mr. Robert H. Engelken
Office of Inspection and Enforcement
Region V
U.S. Nuclear Regulatory Commission
1450 Maria Lane
Suite 210, Walnut Creek Plaza
Walnut Creek, CA 94596

SUBJECT: DOCKET 50-528 CPPR-141
PALO VERDE NUCLEAR GENERATING STATION
IE INSPECTION REPORT 82-09

IE Inspection Report 50-528/82-09 dated May 12, 1982 identified two items of non-compliance. We have reviewed the subject inspection report and are providing the attached response for the two items.

Arizona Public Service is in full compliance with the items identified and plans to take no further action other than that specified in our attached responses.

Sincerely,

GCA/SRF/jeh

Attachment

cc: Director, Office of Nuclear Regulation
Director, Office of Inspection and Enforcement
NRC Resident Inspector--PVNGS
NRC Project Manager

File: 82-055-026

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ATTACHMENT

ARIZONA PUBLIC SERVICE COMPANY

RESPONSE TO IE INSPECTION REPORT NO. 50-528/82-09

DOCKET NO. 50-528

CONSTRUCTION PERMIT NO. CPPR-141

ITEM 1

Criterion II of Appendix B to 10 CFR 50 states, in part, that, "Activities affecting quality shall be accomplished under suitable controlled conditions. Controlled conditions include...suitable environmental conditions for accomplishing the activity, such as adequate cleanness"

Bechtel Procedure WP/P-QCI No. 13, "Housekeeping" states in Paragraph 6.4.4.1, "A Zone IV area or item shall be swept clean of dirt and debris" and states in Paragraph 6.5.2.2 for a Zone V area, "Garbage, trash, scrap, litter, and other excess waste materials shall be collected and disposed of by burning, burying or removal from the jobsite. Such excess material shall not be allowed to accumulate."

Contrary to the above on April 15, 1982, the inspector observed the following:

- a. Excessive debris, concrete dust and fire protective insulation fines were found accumulated on equipment and floors in the Zone IV Class IE battery charger rooms. Several equipment protective coverings had been removed exposing opened electrical cabinets which were energized to the degraded environment.
- b. Empty soft drink cans, insulation pads, hoses and other debris had been discarded in a Zone V confined area between the outside control room shutdown cabinets. An accumulation of concrete and fire protective insulation fines had also accumulated within the cabinets which were posted as energized.

This is a Level V Violation (Supplement II)

RESPONSE TO ITEM 1

1. Corrective Steps Which Have Been Taken and the Results Achieved

The battery charger rooms, remote shutdown cabinets and adjacent areas have been cleaned by removing trash, dirt, and unnecessary construction material. Also, Prerequisite Test Directors and Startup Engineers have been directed to conduct frequent inspections of areas containing energized electrical equipment noting cleanliness among other things, with particular emphasis on equipment important to nuclear safety.

2. Corrective Steps Which Will Be Taken to Avoid Further Items of Noncompliance

Letters on General Housekeeping Requirements and Housekeeping/Protection of Equipment have been issued to all personnel working at Palo Verde Nuclear Generating Station (PVNGS) signed jointly by APS and Bechtel persons responsible for construction, startup and operation of PVNGS. These letters provided guidelines for maintaining general housekeeping conditions and made violation of housekeeping requirements grounds for immediate termination. They also assigned specific responsibilities for the maintenance of cleanliness and protection of plant equipment in various plant areas as equipment and areas progress from Bechtel Construction to Bechtel or APS Startup and, eventually, to APS Startup or Operations jurisdiction.

3. Date When Full Compliance Will Be Achieved

As of May 18, 1982, administrative steps to clearly identify responsibilities for cleanliness and equipment protection were completed. By May 20, 1982, applicable personnel had been briefed and procedures were implemented.

ITEM 2

Criterion V of Appendix B to 10 CFR 50 states, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instruction procedures, or drawings...."

The Bechtel Administrative Control Procedure AD 115, "Temporary Modification Controls", states in Paragraph 5.1.2, "Field identification of temporary modifications shall be accomplished by attaching the Temporary Modification TagTags shall be placed conspicuously and wherever possible directly on the wire, cable, or component actually modified."

Contrary to the above, on March 26 and 29, 1982, the inspector noted that pressure safety valves had been replaced with temporary vents at the following Unit 1 locations and the modified components were not tagged as required by the procedure.

- a. Containment Sump Line - Line B
- b. Safety Injection Tank 1B
- c. Safety Injection Tank 2B

This is a Severity Level V Violation (Supplement II).

RESPONSE TO ITEM 2

1. Corrective Steps Which Have Been Taken and the Results Achieved

- a. An investigation showed that tags for the temporary modifications listed were issued as follows:

- a) On Containment Sump Line - Line B (1PSIE-PSV140)
Issued February 8, 1982.
- b) On Safety Injection Tank - 1B (1PSIB-PSV241)
Issued February 19, 1982.
- c) On Safety Injection Tank - 2B (1PSIB-PSV221)
Issued February 19, 1982.

Apparently they had been inadvertently removed or destroyed sometime between their issuance and March 26 and 29. Duplicate tags were issued for the above temporary modifications and hung March 26 and March 29, 1982.

- b. The above temporary modifications were removed and permanent plant equipment relief valves reinstalled on May 10, 1982, and applicable temporary modification tags were removed and cleared at that time.

2. Corrective Steps Which Will Be Taken to Avoid Further Items of Noncompliance

Prerequisite Test Directors and Startup Engineers have been directed to periodically verify from tag logs that tags shown as outstanding and installed are actually installed in the indicated locations. Duplicate tags will be issued and placed if the original tag is found missing.

3. Date When Full Compliance Will Be Achieved

Full compliance was achieved April 9, 1982.