

DESIGNATED ORIGINAL

Certified By

Candy Brinker

NOS-82-1205

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NRC

ARIZONA



PUBLIC SERVICE COMPANY

P.O. BOX 21666 PHOENIX, ARIZONA 85036

December 29, 1982

G. CARL ANDOGNINI
VICE PRESIDENT
ELECTRIC OPERATIONS

REGION V

3 PM 1:05

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 94526

Subject: Docket 50-528 CPRR-141
Palo Verde Nuclear Generating Station
IE Inspection Report 82-30

IE Inspection Report 50-528/82-30 dated November 29, 1982, identified one item of non-compliance. We have reviewed the subject inspection report and are providing the attached response for the item.

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

Sincerely,

G. C. Andognini
G. C. Andognini, V.P.
Electric Operations

GCA/je

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. 50-528/82-30

DOCKET NO. 50-528

CONSTRUCTION PERMIT NO. CPPR-141

ITEM

Criterion V of Appendix B to 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 instructions, procedures, or drawings..."

Arizona Public Service Procedure 74CH-9SC02, entitled "Secondary System Hydrostatic Test Chemistry Control," provides chemistry specifications for water if used in the steam generators, following the secondary side hydrostatic test.

Arizona Public Service Procedure 86-303 was used for placing generators in a dry layup condition using a slightly pressurized nitrogen atmosphere following the secondary hydrostatic test.

Contrary to the above, on October 19, 1982, water that did not meet chemistry specifications was allowed to fill the No. 1 steam generator which was in a slightly pressurized dry layup condition. This action was unplanned and occurred as a result of the uncoordinated testing of a valve in the feedwater line which permitted flush water to enter the steam generator and steam lines.

This is a Level V Violation.

RESPONSE TO ITEM

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

The primary concern of this incident involved possible impact to the equipment. The investigation into this incident identified four possible areas. These areas were identified as: 1) Chemistry/Corrosion Impact; 2) Pressure/Temperature Impact; 3) Steam Generator Instrumentation Impact; 4) Possible Over Stressing of the Main Steam Lines.

To prevent any chemistry/corrosion impact, a recovery program was initiated and consisted of repeated filling, circulation, and drain of the steam generator with hydrazine treated Grade A water while simultaneously monitoring the discharge water chemistry. Both a visual and fiber optic examination was completed and the generator was determined to be clean internally. Finally, the generator was filled with nitrogen and placed in dry lay-up.

Combustion Engineering has completed an analysis as to the possible mechanical damage due to pressurizing at low pressure and has determined that no damage is expected in any part of the generator.

An evaluation was performed by the instrument and control group and no adverse effect on the steam generator instrumentation is expected.

In addition to the Steam Generator fill, both main steam lines up to the isolation valves were also filled with approximately 40,000 lbs. of water. The lines and supports have been designed for this extra weight for hydro test purposes, and therefore no abnormal stressing of the line resulted.

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

The investigation into the inadvertent fill of the Steam Generator determined that the major cause of the incident was due to improper training/indoctrination of contract personnel and improper use of the APS Valve Tagging Procedure. Based on the findings resulting from the investigation, the following actions to prevent re-occurrence will be taken:

- a. A review of the Valve Tagging Procedures was conducted with the reduction of tagging and valve position errors as the goal. This included additional operator training on the technical aspects of valves and their operations.
- b. The current requestor list for the Tagging and Clearance Procedure has been deleted. The Tagging and Clearance Procedure was revised to require that any individual requiring a clearance must first be trained and then certified by the Shift Supervisors before being placed on the new requestor list.

3. Date When Full Compliance Will Be Achieved

Full compliance was achieved on December 15, 1982.