

Arizona Public Service Company

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G. CARL ANDOGNINI  
VICE PRESIDENT  
NUCLEAR OPERATIONS

September 9, 1983

NOLD 83-143

Mr. John B. Martin  
Office of Inspection and Enforcement  
Region V  
U. S. Nuclear Regulatory Commission  
1450 Maria Lane, Suite 210  
Walnut Creek Plaza  
Walnut Creek, California 94596

Subject: Palo Verde Nuclear Generating Station  
Docket Nos. STN 50-528/529/530  
File: 83-055-026

Reference: (A) Inspection Report No. 50-518/83-31 to G. C. Andognini from  
D. M. Sternberg, dated August 9, 1983.

Dear Mr. Martin:

As a result of the inspection conducted on July 1, - July 29, 1983, and in accordance with NRC Enforcement Policy, 10 CFR Part 2, Appendix C. 47 FR 9987, the following violation was identified:

1. 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 instructions, procedures, or drawings...."

Precore Hot Functional Testing Controlling Document 90 HF-1ZZ01- contains a test prerequisite confirming completion of the following action: "A walkdown of the auxiliary building has been completed. The area is free of flammable materials in the proximity of potentially hot piping and is acceptable for the operation of precore HFT." The control was intended to prevent fires or degradation of operating equipment.

Contrary to the above on July 6, 1983, the inspector observed the following:

- a. A temporary construction power cable which was energized and resting on a section of uninsulated letdown line in the auxiliary building was not removed prior to plant heatup. Following heatup the hot section of line melted the cable insulation causing the conductors to come in contact with the pipe. This in turn caused arcing which eventually burned a hole in the letdown line. Reactor cooldown from the hot functional test was in progress at the time the leak occurred requiring the operators to isolate the letdown line and adopt an alternate method of controlling pressurizer level.

Company's Response to Notice of Violation

1. Corrective Action Which Has Been Taken and Results Achieved.

The subject power cable was removed from the area and returned to Construction for disposition. The affected section of piping was then identified (line N-027-CCBA-2" between the Regenerative and Letdown Heat Exchangers) and the measures necessary to replace the affected section were initiated. Replacement was completed 8/1/83 with subsequent hydrostatic testing performed on 8/4/83.

2. Corrective Action Which Will Be Taken to Avoid Further Noncompliance.

An investigation was performed to determine how and when the cable came to rest on the exposed section of pipe. It was not possible, based upon the gathered information, to determine if the cable had been:

- a. Overlooked during the walkdown,
- b. placed in the area after the walkdown, or
- c. dislodged from an acceptable routing.

Pursuant to the investigation, all Startup personnel are being informed of the Notice of Violation and are being directed to ensure that all actions called for by a procedure statement are complete and, in particular, that when prerequisites are established that measures are taken to ensure that they remain in effect until modified by the establishing procedure. Also, the Startup Safety Organization was made aware of the situation and as further reinforcement the incident is being used as the subject of a Startup Safety Meeting. The meeting will make specific reference to the Notice of Violation.

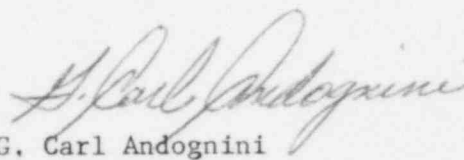
3. Date When Full Compliance Will Be Achieved.

The replacement and testing of the affected section of piping were completed 8/1/83 and 8/4/83 respectively. The notification of Startup personnel, per a Safety Directive, and the Safety Meeting were completed by 9/1/83.

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We feel that this response adequately addresses the item of concern. Should you have any questions, please feel free to contact me.

Very truly yours,

  
G. Carl Andognini

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