

Arizona Public Service Company

April 9, 1984
ANPP-29248-BSK/TRB

U. S. Nuclear Regulatory Commission
Region V
Creskide Oaks Office Park
1450 Maria Lane - Suite 210
Walnut Creek, CA 94596-5368

Attention: Mr. T. W. Bishop, Director
Division of Resident
Reactor Projects and Engineering Programs

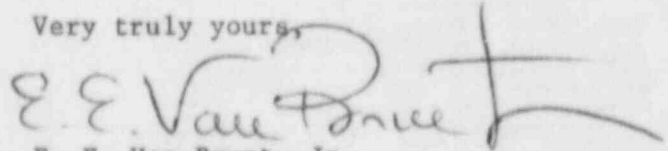
Subject: Final Report - DER 84-01
A 50.55(e) Reportable Condition Relating to Methodology Used
To Track Required Retesting Activities
File: 84-019-026; D.4.33.2

Reference: A) Telephone Conversation between P. Narbut and J. Cook on
January 20, 1984
B) ANPP-28840 dated, February 13, 1984 (Interim Report)

Dear Sir:

Attached is our final written report of the deficiency referenced above,
which has been determined to be Not Reportable under the requirements of
10CFR50.55(e).

Very truly yours,



E. E. Van Brunt, Jr.
APS Vice President, Nuclear
ANPP Project Director

EEVB/TRB:db

Attachment

cc: See Page Two

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Mr. T. W. Bishop
DER 84-01
Page Two

cc: Richard DeYoung, Director
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FINAL REPORT - DER 84-01
DEFICIENCY EVALUATION 50.55(e)
ARIZONA PUBLIC SERVICE COMPANY (APS)
PVNGS UNIT 1

I. Description of Deficiency

During a Management review of the Startup retesting program for Unit 1, it was reported that the methodology used to track the required retesting activities was not described as a documented Startup program. Also, outstanding preoperational retests during and after turnover to Operations are not adequately controlled by procedure; this condition was documented by issuance of Corrective Action Request CAR S-83-267-N. The system in effect at the time of the CAR was as follows:

The required preoperational testing requirements which are identified by the Startup Engineer after work is completed on a tested system were added to a computerized listing "Preoperational Retesting/Testing Requirements on Startup Work Authorizations" by the Technical Support Supervision.

The CAR identified two items requiring retests which had not been placed on this computerized listing. An analysis of the items has revealed the following:

- A. SWA No. 15965 specified retesting using procedure 91-ST-1CLO1 for Containment Isolation Valve 1JRDBUV024 after rework by Construction Tracking of this requirement had been included in the weekly Leak Rate Test status report rather than the Discipline Test Schedule listing.
- B. SWA No. 16005 specified retesting using procedure 92CM-1SE01 for Excore System Component 1JSEANE0001A; however, this requirement has no safety significance since procedure 92CM-1SE01 is a commissioning test (which had already been completed) and verification of Systems function will automatically be performed during Startup preoperational test 91PE1SE01.

Neither condition impacts the validity of Startup Testing records.

II. Analysis of Safety Implications

Based on a review of all items referenced in CAR S-83-267N and the fact I.A above was tracked and I.B was not required to be tracked, this condition is evaluated as not reportable under the requirements of 10CFR50.55(e) and 10CFR Part 21, since if left uncorrected this condition would not represent a safety significant condition.

In addition, as part of the Startup Recovery Program (Ref. letter PVNGS JEK-M-83-1072) a review of all work authorization and work control documentation generated against the Chemical and Volume Control (CH) system after the start of all preoperational tests was completed. The purpose of this review was to determine if all the required preoperational tests were adequately identified and tracked. No deficiencies were identified supporting the conclusion that the SWA tracking system had been adequately administered, and verified that conditions 1A and 1B above are isolated concerns.

III. Corrective Action

As part of the Startup Recovery Program, applicable work authorization and work control documentation is being reviewed. This review will ensure that the current tracking system accurately reflects the need for any system retesting and that the data base is updated to include required initial preoperational tests and associated retests as work is performed on the system. This is an on-going process and will be completed on a subsystem basis prior to acceptance of the subsystem by operations.

Procedures 90GA-OZZ22 Discipline Test Schedule and 90GA-OZZ02 Startup Information Center have been revised to provide a documented program to track requirements for outstanding preoperational retest after work is performed on a previously tested structure system or component. The use of these procedures will preclude recurrence of concern for Units 2 and 3.

CAR S-83-267-N will provide follow-up verification documentation that the corrective action has been implemented.