

Arizona Public Service Company

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April 24, 1984
ANPP-29353-BSK/TRB

Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Response to Enforcement Letter and Notice of Violation,
dated December 12, 1983
File: 84-070-026

Reference: (A) ANPP-28749-EEVBJr/WEI, dated January 31, 1984,
Same Subject

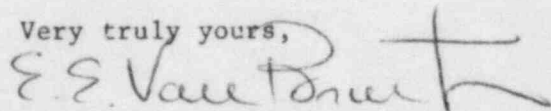
Dear Sir:

Reference (A) detailed controls which were put in place in response to Findings of internal audits as well as the Construction Assessment Team Inspection of September 1983. We have found it necessary, after working with these controls, to modify them slightly. The modifications are necessary to achieve our goals of quality, while still being effective during the start-up transition period. These changes are being made using the appropriate procedures for the Palo Verde Nuclear Generating Station. The changes which are being made are detailed in Attachment A. Additional changes may be required as more experience is gained with the program. Future changes, if needed, will be made in accordance with the approved Palo Verde procedures. Only those changes in programs detailed in the FSAR will be reported.

Additionally, some of the estimated completion dates given in our referenced letter have not or will not be made. Attachment B updates this area.

If there are any questions concerning these matters, please do not hesitate to contact me.

Very truly yours,



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

EEVBJr/WEI:db

Attachments

8404270071 840424
PDR ADOCK 05000528
Q PDR

cc: See Page Two

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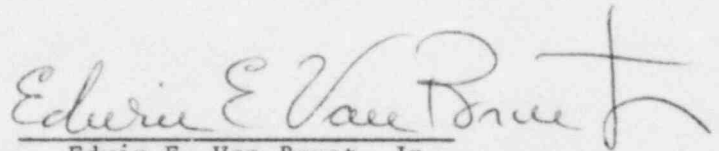
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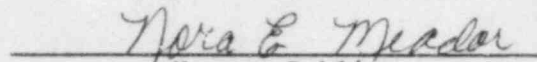
cc: J. B. Martin, NRC Region V
L. E. Vorderbrueggen, NRC
G. A. Fiorelli, NRC
K. L. Turley
T. G. Woods, Jr.
W. E. Ide

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President, Nuclear of Arizona Public Service Company, 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.


Edwin E. Van Brunt, Jr.

Sworn to before me this 24th day of April, 1984.


Notary Public

My Commission Expires:

My Commission Expires April 6, 1987

ATTACHMENT A

MODIFICATION/CLARIFICATION TO PROGRAMS ESTABLISHED AS A RESULT OF NRC CONSTRUCTION ASSESSMENT TEAM INSPECTION

1. Use of Tags

Attachment C page 14 of the referenced letter notes that during the start-up phase, tags would be hung to identify problems locally. This action was a Shift Supervisor responsibility. The use of tags during the start-up period to identify problems locally has proven to be ineffective, as well as inefficient. Close supervision by the principle Start-Up Engineer of each system and test has resulted in correction of deficiencies in a very short period of time. Problems have been experienced however, with the tags hung by Operations personnel. The operators have been putting tags on the system after the deficiency has already been corrected. This has created a confusing situation. Since during the start-up period a system is closely monitored by the principle Start-up Engineer and, since he is responsible for the testing of that system, experience has shown that tags need not be hung. Once systems have been accepted by the PVNGS Operations Department however, tags will be hung at the direction of the Unit Shift Supervisor to identify problems locally.

2. Capping of Containment Pressure Sensing Line

Attachment C page 6 states that the Station Manual Procedure No. 41ST-1ZZ13 will be revised to specifically address removal/verification of removal of the containment pressure sensing line caps prior to entry into Mode 5. Containment integrity however, would only be established prior to going into Mode 4. As a result, removal and verification of removal of these caps will be performed prior to entering Mode 4 rather than Mode 5. This action is considered prudent since considerable time, possibly several weeks, could elapse from entry into Mode 5, to establishment of containment integrity. Therefore, the effectiveness of our corrective action is improved by taking this action prior to entering Mode 4.

3. Role of the Shift Supervisor

Attachment A and Attachment C of the referenced letter, notes that the Operations Shift Supervisor would be given increased responsibility to maintain configuration or be knowledgeable of the configuration of the plant during the start-up phase. A review of this system, which has been in effect for approximately two months, has determined that this system is ineffective and has not aided in the control of work, the availability of system status, or the control of testing. Therefore, management has decided that during prerequisite and Phase 1 Start-up testing, when systems are under the jurisdiction of PVNGS Start-up, the Unit Start-up Manager has total responsibility and authority over the system/subsystem under Start-up's jurisdiction.

Role of the Shift Supervisor (Cont'd.)

During this period of time, the Operations Shift Supervisor will operate equipment safely at the direction of Start-up. He will also be responsible for tagging of plant components in accordance with applicable Station Manual Procedures. Subsequent to system acceptance, the Unit Shift Supervisor's responsibilities will be expanded to include authorization and control of all operations, maintenance and testing on accepted systems in accordance with Station Manual Procedure No. 30AC-9ZZ01.

ATTACHMENT B

NRC CAT COMMITMENTS
Late Responses

Attachment D, Violation II.B.2 (pg. 35)

Commitment: The revisions to Specification 13-CM-307 and Construction Procedure WPP/QCI 24.1 will be issued by February 27, 1984.

Status: The revisions were issued by March 30, 1984.

Attachment D, Violation II.B.3 (pg. 49)

Commitment: QA verification of corrective action taken by QC for CAR S-83-56 will be completed by February 15, 1984.

Status: CAR S-83-56 was closed on April 2, 1984.

Attachment D, Violation II.C.1 (pg. 61)

Commitment: A review to provide additional assurance of consistency between the licensing documents and the other currently implemented construction specifications is currently being completed and will be documented by the final report issued for DER 83-72.

Status: A preliminary review was completed and documented by the Final Report for DER 83-72, Part III. A final detailed review will be completed by May 1, 1984 and documented via letter from BPC to APS.

Attachment D, Violation II.C.1 (pg. 62)

Commitment: SARC 1123 to be issued for NRC review by March 31, 1984.

Status: SARC 1123 will be issued for NRC review by June 1, 1984. APS letter to NRC (ANPP-29302, dated April 13, 1984), has been sent requesting change in due date.

Attachment D, Violation II.B.2

Commitment: Expanded evaluation of the installed concrete anchors will be completed and documented by April 1, 1984.

Status: The evaluation has been completed and was submitted to APS April 12, 1984.

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Attachment C, Violation I.A.1 (pg. 6 and 7)

Commitment: Station Manual Procedure 41ST-1ZZ13 will be revised to specifically address removal/verification of removal of containment pressure sensing line caps prior to entry into Mode 5 by March 23, 1984.

Status: This procedure will be issued by May 15, 1984.

Attachment C, Violation I.A.1 (pg. 6 and 7)

Commitment: Surveillance procedure 36-ST-9SB03 will include a step that requires a blowdown and visual inspection of the lines.

Status: This procedure will be issued by June 29, 1984.

Attachment C, Violation I.A.2 (pg. 12 and 13) and I.A.3 (pg. 20)

Commitment: The Construction Inspection Procedures (CIPs) will be revised and a walkdown package to reinspect all safety-related valves in Unit 1 and 2 utilizing Roto Hammer remote operators will be completed by February 15, 1984. Any nonconforming conditions will be documented and included in the final report to DER 83-87.

Status: CIP 521.0 was revised and issued on January 26, 1984. DER 83-87, issued March 13, 1984, documented the status of reinspections and results to date. The completion and results of the reinspections will be tracked and dispositioned in accordance with the corrective actions specified by the DER.

Attachment D, Violation II.B.3 (pg. 49)

Commitment: The revised final report for DER 83-74 will be issued by February 28, 1984.

Status: The report was issued March 1, 1984.

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Page Three

Attachment D, Violation II.C.1 (pg. 62)

Commitment: Revision to PQPM Procedure 18.6 (which will include structural steel welding) will be issued by February 28, 1984.

Status: PQPM 18.6, Rev. 3, dated February 16, 1984 did not include structural steel welding. Revision 4 will be issued by June 1, 1984 to include structural steel welding.