

Arizona Public Service Company

April 13, 1984

ANPP- 29300 -BSK/TRB

U. S. Nuclear Regulatory Commission
Region V
Creekside 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 83-88: Relating to Identified QA
Failures/Lack of Procedures and Programs for Testing and
Startup Activities

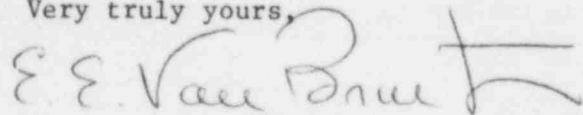
File: 84-019-026; D.4.33.2

Reference: A) Telephone Conversation between P. Narbut and K. Parrish on
December 23, 1983
B) ANPP-28640, dated January 18, 1984 (Interim Report)

Dear Sir:

Attached is our final written report of the deficiency referenced above.

Very truly yours,



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

EEVB/TRB:dlm

Attachment

cc: See Page Two

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DER 83-88
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cc: Richard DeYoung, Director
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FINAL REPORT - DER 83-88
DEFICIENCY EVALUATION 50.55(e)
ARIZONA PUBLIC SERVICE COMPANY (APS)
PVNGS UNITS 1, 2, 3

I. Condition Description

As a result of the statement by the Construction Assessment Team (CAT) during their inspection that there was a weakness in the Quality Assurance (QA) Program during startup, an in-depth audit of the Startup Program was performed.

The Startup Quality Assurance (QA) Audit (S-83-036) identified several potentially significant deficiencies. These deficiencies appear to have been a result of incompletely developed Startup procedures and/or an inconsistent application of the APS QA Program.

Corrective Action Requests (CARs) were initiated for each apparent deficiency identified in the audit. These CARs provided an appropriate vehicle for tracking all efforts to resolve the deficiencies in a satisfactory and timely manner.

This Deficiency Evaluation Report was initiated to collectively evaluate the applicable CARs for reportability under 10CFR50.55(e).

II. Analysis of Safety Implications

The corrective actions completed to date in response to this audit have not revealed an item identifiable as a safety significant condition. However, it is assumed for the purposes hereof and to provide the basis for a conservative management approach, that some or all of the conditions identified in the CAR's are or could have been safety significant. The collective corrective actions described below are designed to deal with all such identified conditions whether or not they have safety significance.

III. Corrective Action

Responses to each CAR resulting from the audit (S-83-036) have been developed by appropriate APS and Bechtel organizations and have been reviewed for appropriate interface control. APS Quality Assurance has reviewed and accepted the responses. Follow up and verification of compliance with committed actions to preclude recurrence will be performed by the appropriate Quality Assurance organization, as applicable for each identified CAR.

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The following identifies the key generic corrective action programs which have been completed or are currently being implemented. This list provides additional detail to those actions described in Attachment A to ANPP-28749-EEVB/WEI, dated January 31, 1984 which was a response to the NRC Enforcement Letter dated December 12, 1983.

- A. Organization restructuring has included a Transition Manager to provide a means for centralized management and coordination of the interfaces among the several organizations of APS, Bechtel and Combustion Engineering.
- B. The plan for the recommencement of Startup work and testing for each system or subsystem requires the performance of five basic actions identified below:
 - 1. A review of the Discipline Test Schedule (DTS) for the system or subsystem to ensure that each quality related component that may require prerequisite testing, in accordance with 90GA-0ZZ23, has been listed for further evaluation. The applicable Group Supervisors are responsible for ensuring each component listed on DTS is evaluated for testing based upon that specific component's application in the field.
 - 2. A review of work authorization documentation that was issued against the system or subsystem which has been successfully tested through Preoperational (Phase 1) testing to ensure:
 - That the proper test(s) or retest(s) were listed on the work authorization document based upon the actual work performed.
 - That the test(s) or retest(s) were listed and tracked on the DTS or the Preoperational SWA Tracking Program.
 - 3. A review of presently completed prerequisite test data sheets to ensure:
 - That each data sheet has been properly closed in accordance with administrative requirements.
 - That each data sheet, or properly identified group of data sheets, has been technically completed for the applicable component.
 - 4. A review of prerequisite and preoperational test procedures and applicable test logs to verify that no physical work was performed without the applicable work control documentation properly completed and stored.

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5. A review of quality related systems, structures and components to ensure that deviations of as-built configurations from design configurations are identified and evaluated to verify that the test results are not invalidated.
- C. A review of the licensing commitments assigned to Startup, as stated in the Licensing Commitment Tracking Systems (LCTS) to ensure that the commitments are, or will be, met by specific Startup procedures.
- D. Procedures and directives identified by the detailed responses to each CAR will be reviewed and revised as appropriate to provide the methodologies necessary to preclude recurrence of the conditions identified in the CAR or to resolve other problems as they occur.
- E. Training has been conducted concerning the need for meticulous attention to detail, in work activities and documentation. Additionally, training is being provided, as appropriate, in the procedures to control testing and work activities, equipment tagging and housekeeping procedures.