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U. S. Nuclear Regulatory Commission  
Region V  
Creekside Oaks Office Park  
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Attention: Mr. T. W. Bishop, Director  
Division of Resident  
Reactor Projects and Engineering Programs

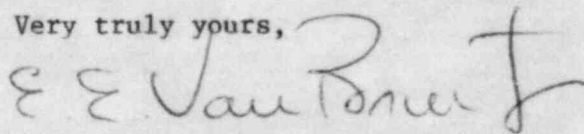
Subject: Final Report - DER 84-07  
A 50.55(e) Reportable Condition Relating To Failure To Provide  
Corrective Action As Stated In DER 80-21.  
File: 84-019-026; D.4.33.2

Reference: A) Telephone Conversation between P. Narbut and T. Bradish on  
February 9, 1984  
B) ANPP-28996, dated March 2, 1984 (Interim Report)  
C) ANPP-29283, dated April 12, 1984 (Time Extension)  
D) ANPP-29607, dated May 29, 1984 (Time Extension)

Dear Sir:

Attached is our final written report of the Reportable Deficiency under  
10CFR50.55(e), referenced above.

Very truly yours,



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

EEVB/TRB:db

Attachment

cc: See Page Two

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Mr. T. W. Bishop  
LER 84-07  
Page Two

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Washington, D. C. 20555

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FINAL REPORT - DER 84-07  
DEFICIENCY EVALUATION 50.55 (e)  
ARIZONA PUBLIC SERVICE COMPANY (APS)  
PVNGS UNITS 1, 2 & 3

I. Description of Deficiency

This report was initiated to document the failure to complete corrective action as contained in DER 80-21, described in Part A below. This failure was a result of an inadequate tracking program for DER commitments. As a result of this condition, a 100% investigation of all corrective action commitments was completed for all DERs issued by the PVNGS. This investigation revealed one other condition of incomplete implementation of corrective action. This condition is described in Part B.

Part A

The corrective action for DER 80-21 called for modification of certain Borg-Warner valves in Units 1, 2 and 3 by means of Bechtel NCR PX-1412. The deficiency of DER 80-21 was previously evaluated as reportable under 19CFR50.55(e) and Part 21.

- ° The valves in Unit 1 were modified on August 29, 1980 as documented by the disposition of NCR PX-1412/QCE Stamp 115.

Subsequently, Borg-Warner directed further modification of these same valves, and NCR NA-372 was issued to accommodate this additional rework. The following sequence of events occurred:

- ° On June 15, 1981, all of the valves in Unit 1 were reworked per NCR NA-372/QCE Stamp 115.
- ° On June 15, 1981, some of the valves in Units 2 and 3 were modified for the first time per NCR PX-1412/QCE Stamp 115.
- ° On October 21, 1981, NCR NA-372 (for the additional rework) was revised to state that it superseded NCR PX-1412 (for the original modification). This deleted the original modification for those valves in Units 2 and 3 which were not modified on June 15, 1981.

Since block 15 of DER 80-21 had been closed by the issuance of NCR PX-1412, the latter oversight eradicated all documented requirements for the original modifications to the following valves in Units 2 and 3:

2JSIBUV665  
2JSIBUV668  
2JSIAUV669  
2JCHEHV255

3JSIBUV668  
3JSIBUV636  
3JSIAUV637  
3JSIBUV646

As a result of the 100% review of all corrective action commitments contained in DERs this condition has been determined to be an isolated error by personnel implementating the NCR system. Most NCR's address a single Unit, and the individuals responsible for superseding NCR PX-1412 failed to note that it applied to three Units. There existed no check to preclude this from happening. This deficiency was discovered during QA reverification of DERs per Quality Assurance Department Procedure 7.11.

Part P

DER 83-43 documented a deficiency associated with twelve (12) Auxiliary Relay Cabinets (ARCs) manufactured by the Harlo Corporation. These ARCs were all in Unit 1. The deficiency of DER 83-43 was previously evaluated as reportable under 10CFR50.55(e) and Part 21.

- ° Revision 0 of the Final Report (dated 23AU83) called for the following:
  - (a) An inspection of all Class 1E and Non-1E ARCs in Units 1, 2, and 3.
  - (b) The rework of deficiencies in twelve (12) ARCs in Unit 1 per NCR SE-1574.
  - (c) The issuance of future NCRs (which would cross-reference DER 83-43) to correct any subsequent deficiencies found.
- ° Revision 1 (dated 27OC83) revised the corrective action to:
  - (a) Document the issuance of NCRs SE-3148 and EA-3548 for the same (12) ARCs in Units 2 and 3.
  - (b) Delete the provision to issue future NCRs as required. Since additional NCRs were required to correct ARCs in addition to the original 12 and the DER had been closed, APS Corrective Action Report S-84-006-N was issued to document this conflict.
- ° Revision 2 (dated 17FE84) revised the corrective action to reinstate the provision to issue future NCRs to correct additional discovery.

The corrective action of Revision 0 was not sufficiently defined in that no document was issued to require the inspection of all Class 1E and Non-1E ARCs in Units 1, 2, and 3, and a misleading statement was made in Revision 1 when the provision to issue future NCRs was deleted.



## II. Analysis of Safety Implications

DER 80-21 and DER 83-43 have previously been evaluated as reportable in the respective Final Reports as submitted to the NRC.

The failure to properly complete corrective action committed to in the Deficiency Evaluation Reports is evaluated as reportable under 10CFR50.55(e).

## III. Corrective Action

1. NCRs NA-1251 and NA-1252 for Units 3 and 2 respectively have been initiated to reinstate the rework requirement specified in DER 80-21. Bechtel has dispositioned the NCRs to inspect the remaining valves to determine if the modifications were performed. Those valves that have not received the required modifications will be modified as required by these NCRs.
2. The Project Quality Program Manual (PQPM) Section 16.0, Corrective Action, was revised on January 31, 1984 to provide a corrective action reverification program. This program provides and assures the follow-up and completion verification of corrective action as committed by DERs and/or corrective action reports.
3. Bechtel Quality Assurance has reviewed the corrective action commitments of all previously issued DER's and has implemented a tracking system to ensure completion of all commitments.
4. Action to preclude recurrence includes a review of this DER by the responsible individuals in Engineering and Quality Assurance.
5. CAR S-84-006-N has been completed.
6. Should any additional corrective action conditions similar to this report be identified, they shall be identified by issuance of a Corrective Action Report.