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REGIONAL

November 1, 1984
ANPP-31037-TDS/ATR

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

Attention: Mr. T. W. Bishop, Director
Division of Reactor Safety and Projects

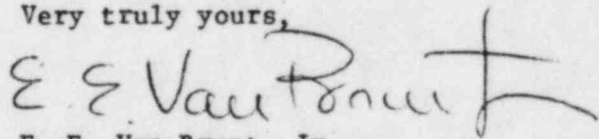
Subject: Notice of Violation
File: 84-019-026; D.4.33.2

Reference: (1) Letter from E. E. Van Brunt, Jr. to T. W. Bishop, dated
October 29, 1984
(2) Letter from E. E. Van Brunt, Jr. to T. W. Bishop, dated
October 12, 1984

Dear Sir:

The referenced letters committed to provide a supplemental report which includes the root cause analysis and the results of the investigations performed in response to the Subject NRC Violation. This report is presented in Attachment A.

Very truly yours,



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

EEVB/ATR/nj
Attachment

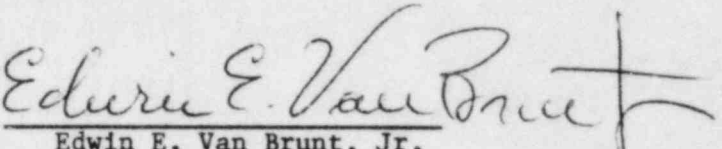
cc: See Page Two

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PDR ADCK 05000528
G PDR

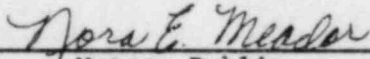
IE-01

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President, Nuclear Production 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 2nd day of November, 1984.



Notary Public

My Commission Expires:

My Commission Expires April 6, 1987

Mr. T. W. Bishop
Notice of Violation
Page Two

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

T. G. Woods, Jr.
D. B. Karner
W. E. Ide
D. B. Fasnacht
A. C. Rogers
L. A. Souza
D. E. Fowler
T. D. Shriver
B. S. Kaplan
C. N. Russo
J. Vorees
J. R. Bynum
J. M. Allen
A. C. Gehr
W. J. Stubblefield
W. G. Bingham
R. L. Patterson
R. W. Welcher
H. D. Foster
D. R. Hawkinson
R. P. Zimmerman
L. Clyde
M. Woods
T. J. Bloom

Records Center
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
Atlanta, GA 30339

ATTACHMENT A

NOTICE OF VIOLATION 50-528/84-28/01 SUPPLEMENTAL REPORT

On July 20, 1984 Resident Engineering failed to properly disposition Startup Field Report (SFR) 1S1-723, documenting a failure of containment sump recirculation valve 1JSIAUV673 to open remotely from the Control Room on July 5, 1984, in that the SFR was incorrectly closed as "not valid" without: (1) adequately evaluating the safety significance of the failure of the valve to open, (2) determining the full cause of the condition which prevented the valve from opening, and (3) taking appropriate corrective action to preclude repetition.

NRC Inspection 50-528/84-28-01 identified this action as a Notice of Violation. In response to the Notice of Violation, APS committed to have Bechtel Resident Engineering perform a review of SFRs and to have APS Quality Assurance investigate similar project documents that are used to document problems in order to determine the root cause and any necessary actions. The following provides the results of the review/investigation as committed to in the reference letters.

A. Results of SFR Review by Bechtel Resident Engineering

The Bechtel review was performed to determine:

- a) adequacy of invalidation decision
- b) technical adequacy of disposition
- c) completion of action prior to closure

Results of the actions taken are summarized below in order of the above listing:

- a) 1,875 SFRs were reviewed to determine the number in the "Not Valid" category and the adequacy of the responses. Of the 1,875 SFRs, 74 (approximately 4%) were designated as "Not Valid," and only 1 of the responses was not acceptable.

The majority were marked "Not Valid" because the SFRs concerned:

- problems resolved on previous SFRs
- documents that had been revised, or
- problems neither appropriately nor procedurally addressed by the SFR process.

The Startup program requires that an SFR complete the entire review cycle once it is initiated. Therefore, "Not Valid" SFRs will occasionally occur.

- b) An additional 433 SFRs were reviewed in detail to determine technical adequacy. The review was performed by Bechtel Home Office Engineering groups in accordance with Procedure IP-5.17. The SFRs reviewed were found to be acceptable.
- c) The same group of 433 SFRs was reviewed to determine if the resolutions represented completion of action with the following results:
 - 1. 430 SFRs were acceptable. The responses were either complete within themselves or referred to valid documents.
 - 2. Two SFRs referred to DCPs that were subsequently cancelled during APS Change Control Group review. Bechtel Engineering confirms DCP cancellations to APS Operations via letter. Also, the Unit 1 Master Tracking System normally indicates DCP cancellation in the "comments" section. Document correction notices have been issued to clarify the status of the DCPs.
 - 3. One SFR referred to the response on another SFR which had been used to resolve the same problem. At the time the later SFR was dispositioned, there had been no feedback as to whether the original document had resolved the problem.

B. Results of APS Overview

The APS Quality Assurance Department initiated an investigation to review the procedural controls in use at PVNGS to control the disposition of nonconformance documents, as well as reviewing a representative sample of the types of nonconformance to verify the adequacy of the justification to support invalidation. This investigation identified problems in properly documenting the rationale for justification. Further investigation by interviewing the document initiator or other individuals involved revealed that the nonconforming documents could be substantiated as being "Not Valid." The investigation determined the problem was one of documentation and not one of affecting quality.

APS Nuclear Engineering will review a sample of the Bechtel-reviewed documents to independently verify the adequacy of the technical dispositions and the adequacy of the justification for invalidation of SFRs.

Attachment A
Notice of Violation 50-528/84-28/01
Supplemental Report
Page Three

Root Cause Analysis

Based upon the investigations conducted, human error in documenting justifications for the invalidation of SFRs is considered to be the root cause. The relatively few problems identified attest that this condition is limited, and no additional actions are required beyond the training and continued emphasis on proper documentation of the Nonconformance process, unless the APS Nuclear Engineering review notes further discrepancies.