

Arizona Public Service Company

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-02388-WFC/TRB/GEC

January 2, 1993

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-37
Washington, DC 20555

- References:
1. Letter dated December 8, 1992, from R. J. Pate, NRC, to W. F. Conway, APS
 2. Letter dated August 28, 1992, from J. M. Levine, APS, to NRC; Special Report 1-SR-92-005

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Reply to Notice of Violation 50-528/92-34-03
File: 93-070-026

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528,529,530/92-34 and the enclosed Notice of Violation, dated December 8, 1992, transmitted by Reference 1. Enclosure 1 to this letter is a restatement of the Notice of Violation and Enclosure 2 to this letter provides APS' reply to the Notice of Violation, pursuant to the provisions of 10 CFR 2.201.

Reference 2 provided a description of this event along with a discussion of related, ongoing actions.

Should you have any questions, please call Thomas R. Bradish at (602) 393-5421.

Sincerely,

James M. Levine for WFC

WFC/TRB/GEC/gec 110089

Enclosures

1. Restatement of Notice of Violation
2. Reply to Notice of Violation

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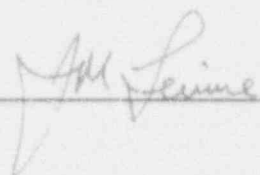
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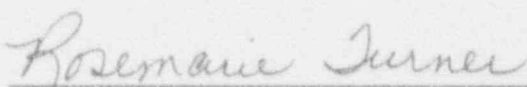
cc: J. B. Martin
J. A. Sloan

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, J. M. Levine, represent that I am Vice President Nuclear Production, 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 and correct.


J. M. Levine

Sworn To Before Me This 2nd Day Of January 1993.


Notary Public

My Commission Expires

May 9, 1995

ENCLOSURE 1

RESTATEMENT OF NOTICE OF VIOLATION
50-528/92-34-03

NRC INSPECTION CONDUCTED
OCTOBER 5, 1992 - OCTOBER 9, 1992

INSPECTION REPORT NOS.
50-528, 529, AND 530/92-34

RESTATEMENT OF NOTICE OF VIOLATION 50-528/92-34-03

During an NRC inspection conducted on October 5-9, 1992, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification 6.8.1 requires that the licensee implement procedures which are required to implement the Emergency Plan.

Licensee Emergency Plan Implementing Procedure (EPIP) -02, Emergency Classification, requires completion of an emergency classification within 30 minutes of the occurrence of the event.

EPIP-02 requires declaration of an Unusual Event for loss of meteorological instrumentation.

Contrary to the above, on August 22, 1992, the licensee lost all meteorological instrumentation for about 7 hours, but failed to declare an unusual event within 30 minutes of the loss of meteorological instrumentation.

This is a Severity Level IV Violation (Supplement VIII).

ENCLOSURE 2

REPLY TO NOTICE OF VIOLATION
50-528/92-34-03

NRC INSPECTION CONDUCTED
OCTOBER 5, 1992 - OCTOBER 9, 1992

INSPECTION REPORT NOS.
50-528, 529, AND 530/92-34

REPLY TO NOTICE OF VIOLATION 50-528/92-34-03

Reason for the Violation

The reason for the violation has been determined to be an inadequate procedure. During the performance of surveillance test procedure 41ST-1ZZ16, "Routine Surveillance Daily Midnight Logs", it was identified that information was not remotely available from the on-site Meteorological Tower. An Auxiliary Operator was dispatched to the Meteorological Tower to obtain data locally. At approximately 2245 the Auxiliary Operator reported that power had been lost to the Meteorological Tower. Loss of power was verified and Technical Specification action statement 3.3.3.4a was entered as prescribed by the surveillance test. However, the surveillance test procedure did not refer the reader to Emergency Plan Implementing Procedure (EPIP) -02 in the event of the loss of all Meteorological Tower instrumentation.

Corrective Steps that have been Taken and Results Achieved

A note has been incorporated into surveillance test procedure 41ST-1ZZ16, "Routine Surveillance Daily Midnight Logs," to remind the individual performing the surveillance to refer to EPIP-02 if there is a loss of Meteorological Tower instrumentation.

Corrective Steps that will be Taken to Avoid Further Violations

APS believes that the action described above is adequate to prevent recurrence.

Date when Full Compliance will be Achieved

Full compliance was achieved on August 23, 1992, when an Unusual Event was declared based on the total loss of Meteorological Tower instrumentation as required by EPIP-02.