



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION V

1450 MARIA LANE  
WALNUT CREEK, CALIFORNIA 94596-5368

JAN - 5 1993

Docket Nos. 50-528, 50-529, 50-530

Arizona Public Service Company  
P.O. Box 53999, Sta. 9012  
Phoenix, Arizona 85072-3999

Attention: Mr. W. F. Conway  
Executive Vice President, Nuclear

Gentlemen:

Thank you for your letter of December 1, 1992, in response to our Notice of Violation and Inspection Report No. 50-528/92-31, 529/92-31 and 530/92-31, dated November 3, 1992, informing us of the steps you have taken to correct the items which we brought to your attention.

We re-emphasize the need for operators to respond correctly to annunciators to evaluate and correct or investigate plant events. Your corrective actions will be verified during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

S. A. Richards, Deputy Director  
Division of Reactor Safety and Projects

cc:

Mr. O. Mark DeMichele, APS  
Mr. James M. Levine, APS  
Mr. R. Stevens, APS  
Mr. E. C. Simpson, APS  
Mr. S. Guthrie, APS  
Mr. Thomas R. Bradish, APS  
Mr. Robert W. Page, APS  
Ms. Nancy C. Loftin, Esq., APS  
Mr. Al Gutterman, Newman & Holtzinger P.C.  
Mr. James A. Beoletto, Esq., Assistant Counsel, SCE Company  
Mr. Charles B. Brinkman, Combustion Engineering, Inc.  
Mr. Aubrey V. Godwin, Director, Arizona Radiation Regulatory Agency  
Chairman, Maricopa County Board of Supervisors  
Mr. Steve M. Olea, Chief Engineer, Arizona Corporation Commission  
Mr. Curtis Hoskins, El Paso Electric Company  
Roy P. Lessey, Jr., Esq., Akin, Gump, Strauss, Hauer and Feld  
Bradley W. Jones, Esq., Akin, Gump, Strauss, Hauer and Feld  
Mr. Jack R. Newman, Esq., (Newman & Holtzinger)

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JAN - 5 1993

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Bradley W. Jones, Esq., Akin, Gump, Strauss, Hauer and Feld  
Mr. Jack R. Newman, Esq., (Newman & Holtzinger)

bcc w/copy of letter dated December 1, 1992:

Docket File

Resident Inspector

Project Inspector

G. Cook

R. Huey

B. Faulkenberry

J. Martin

J. Zollicoffer

bcc w/o copy of letter dated December 1, 1992:

M. Smith

Region V/ann

*TS phone con*

JSloan

12/29/92

*for* HWong

12/21/92

*HB*  
RHuey

12/31/92

*SR*  
SRichards

1/5/93

REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY	SEND TO PDR
YES / NO	YES / NO	YES / NO	YES / NO	YES / NO

Arizona Public Service Company

P.O. BOX 53999 • PHOENIX, ARIZONA 85072-3999

WILLIAM F. CONWAY  
EXECUTIVE VICE PRESIDENT  
NUCLEAR

102-02362-WFC/TRB/JJN  
December 1, 1992

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

Reference: Letter dated November 3, 1992, from S. A. Richards, Deputy Director  
Division of Reactor Safety and Projects, NRC, to W. F. Conway, Executive  
Vice President, Nuclear, APS

Dear Sirs:

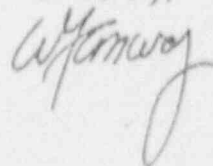
Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. STN 50-528/529/530  
Notice of Violation 50-529/92-31-02  
File: 92-070-026

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/92-31, and the Notice of Violation, dated November 3, 1992. Pursuant to the provisions of 10 CFR 2.201, APS' response is provided as Enclosure 1. Appendix A to this letter is a restatement of the Notice of Violation.

In the cover letter transmitting the Inspection Report, reference was made to a similar violation of operator response to an annunciator. Enclosure 2 provides additional information regarding these two violations.

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

Sincerely,



WFC/TRB/JJN/pmm  
Enclosures:

1. Appendix A - Restatement of Notice of Violation
2. Enclosure 1 - Reply to the Notice of Violation
3. Enclosure 2 - Additional Information Regarding the Violation

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

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APPENDIX A

RESTATEMENT OF NOTICE OF VIOLATION  
50-529/92-31-02

NRC INSPECTION CONDUCTED  
AUGUST 25, 1992 - SEPTEMBER 30, 1992

INSPECTION REPORT NOS. 50-528/529/530/92-31

## RESTATEMENT OF NOTICE OF VIOLATION 50-529/92-31-02

During an NRC inspection conducted on August 5, 1992, through September 30, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C, the violation is listed below:

Unit 2 Technical Specification 6.8.1 states in part: "Written procedures shall be established, implemented, and maintained covering the activities . . . recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February, 1978."

Appendix A of Regulatory Guide 1.33, Revision 2, recommends procedures for safe operation and shutdown.

Procedure 40AC-90P02, "Conduct of Shift Operations," step 3.2.2.8, which implements in part the operations procedures recommendation of Regulatory Guide 1.33, requires that "On shift personnel shall be aware of and responsible for plant status. . . They shall be attentive to instrumentation and respond to abnormal indications until corrected or verified to be false by other instrumentation."

Contrary to the above, on September 3, 1992, Unit 2 control room personnel were not attentive to plant instrumentation and failed to respond to an abnormal alarm indication caused by high level in the non-ESF sump in the Auxiliary Building which later resulted in flooding of the Auxiliary Building.

This is a Severity Level IV violation (Supplement I) applicable to Unit 2.



ENCLOSURE 1

REPLY TO NOTICE OF VIOLATION  
50-529/92-31-02

NRC INSPECTION CONDUCTED  
AUGUST 5, 1992 THROUGH SEPTEMBER 30, 1992

INSPECTION REPORT NOS. 50-528/529/530/92-31

## REPLY TO NOTICE OF VIOLATION 50-529/92-31-02

### Reason For The Violation

The reason for the violation was a personnel error. When the Hi Hi/Lo Lo alarm for the Non-ESF (Unengineered Safety Features) sump annunciated, the Operator did not respond to the alarm in accordance with the alarm response procedure. The Operator believed that the alarm was a result of the running sump pump being out of service and that the standby pump would start and subsequently clear the alarm. However, the sump pump was in service, and the Operator did not verify the condition of the sump pump.

### Corrective Steps That Have Been Taken And Results Achieved

The Operator was counseled about the importance of responding to each alarm and the requirement to follow procedures.

The General Manager of Plant Support has issued a memorandum to the Unit Plant Managers, Assistant Plant Managers, and Operations Managers providing additional guidance regarding control room tours performed as part of the continuing Operations Observation Program. The memorandum discusses this event and the previous event involving improper response to a control room annunciator. The memorandum advises management personnel on the need to question control room personnel when alarm response procedures are not immediately referenced.

### Corrective Steps That Will Be Taken to Avoid Further Violations

This event and a previous event described in Inspection Report 91-49 involving improper response to a control room annunciator will be included as discussion in the Operator Requalification Training Cycle starting in January, 1993. This training will



reemphasize management's expectation that operators are responsible for being aware of plant status and properly responding to abnormal plant conditions.

**Date When Full Compliance Will Be Achieved**

Full compliance was achieved on September 3, 1992, when actions were taken to mitigate this event in accordance with the alarm response procedure.

ENCLOSURE 2

ADDITIONAL INFORMATION REGARDING THE VIOLATION

## ADDITIONAL INFORMATION REGARDING THE VIOLATION

In the cover letter transmitting Inspection Report 50-528/529/530/92-31, reference was made to a similar violation of operator response to an annunciator. In both instances, the operators' responses did not meet APS' standards or practices. As a result, several actions were taken as described in Enclosure 1.

Although these instances resulted in operators improperly responding to alarms, the causes of each instance are distinctly different. In the first instance, the operator acknowledged the alarm, prioritized the alarm with ongoing activities, but forgot to follow-up on the alarm. In the second instance, the operator recognized the alarm but incorrectly decided that no further action was required based on his understanding of plant conditions. Other control room instrumentation would not have aided the operator in validating the operator's assumption. APS procedures permit an operator to acknowledge an alarm without referencing the alarm response procedure if the alarm is an expected occurrence as a result of plant conditions. As discussed above, the operator incorrectly took no further action based on his understanding of plant conditions. APS expects its operators to understand plant conditions, verify plant conditions as appropriate, and take action utilizing approved procedures.