



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION V

1450 MARIA LANE  
WALNUT CREEK, CALIFORNIA 94596-5368

NOV 20 1992

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

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

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

Gentlemen:

Thank you for your letter of October 21, 1992, in response to our Notice of Violation and Inspection Report Numbers 50-528/92-27, 50-529/92-27, and 50-530/92-27, dated September 24, 1992, informing us of the steps you have taken to correct the items which we brought to your attention. 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 & Holtziner P.C.  
Mr. James A. Beoletto, 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

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APS

Docket Nos. 50-528, 50-529, 50-530/92-27

bcc w/copy of ltr dtd 10/21/92:

Docket File

Project Inspector

Resident Inspector

G. Cook

B. Faulkenberry

J. Martin

RHuey

bcc w/o copy of ltr dtd 10/21/92:

M. Smith

J. Zollicoffer

*H. Ringwald*  
JRingwald  
11/9/92

*H. Wong*  
hwong  
11/9/92

*SR*  
SRichards  
11/20/92

*J. Ree*  
JRee  
11/20/92

REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY
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SEND TO PDR
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>

Arizona Public Service Company

P.O. BOX 52495 • PHOENIX, ARIZONA 85072-3995

RECEIVED  
GENERAL  
OCT 27 1992

WILLIAM F. CONWAY  
EXECUTIVE VICE PRESIDENT  
NUCLEAR

102-02319-WFC/TRB/JJN  
October 21, 1992

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

Reference: Letter dated September 24, 1992, from S. A. Richards, Acting Deputy  
Director Division of Reactor Safety and Projects, NRC, to W. F. Conway,  
Executive Vice President, Nuclear, Arizona Public Service Company

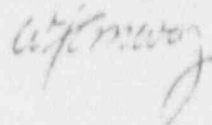
Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. STN 50-528/530/530  
Notice of Violation 50-528/92-27-01  
File: 92-070-026

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528,529,  
530/92-27 and the Notice of Violation, dated September 24, 1992. Pursuant to the  
provisions of 10 CFR 2.201, APS' response is enclosed. Appendix A to this letter is a  
restatement of the Notice of Violation.

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 - Reply to the Notice of Violation

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

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APPENDIX A

RESTATEMENT OF NOTICE OF VIOLATION  
50-528/92-27-01

NRC INSPECTION CONDUCTED  
JULY 19, 1992 - AUGUST 24, 1992

INSPECTION REPORT NOS. 50-528, 529, AND  
530/92-27

## RESTATEMENT OF NOTICE OF VIOLATION 50-528/92-27-01

During an NRC inspection conducted on July 19 through August 24, 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 1 Technical Specification 6.11.1 requires procedures for personnel radiation protection to be prepared consistent with the requirements of 10 CFR Part 20 and to be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Licensee procedure 75AC-9RP01, "Radiation Exposure and Access Control," Revision 1.7, dated June 29, 1992, provides requirements for radiation workers entering radiation areas. Step 2.5.3 of procedure 75AC-9RP01 requires that "... Unit RP (Radiation Protection) and RP Support Services are responsible for: Issuing dosimetry to individuals as specified by the REP (Radiation Exposure Permit)."

REP 1-92-0010-A specifies that an alarming dosimeter with a setpoint of 50 millirem be worn in high radiation areas.

Contrary to the above, on August 20, 1992, procedure 75AC-9RP01 was not followed in that an alarming dosimeter was issued by Unit 1 RP operations to an NRC inspector to be used for entry into a high radiation area that was not set at 50 millirem in accordance with REP 1-92-0010-A.

This is a Severity Level IV violation applicable to Unit 1 (Supplement IV).

ENCLOSURE 1

REPLY TO NOTICE OF VIOLATION  
50-528/92-27-01

NRC INSPECTION CONDUCTED  
JULY 19, 1992 - AUGUST 24, 1992

INSPECTION REPORT NOS. 50-528, 529, AND  
530/92-27



## REPLY TO NOTICE OF VIOLATION 50-528/92-27-01

### Reason For The Violation

The reason for the violation was a personal error on the part of the Radiation Protection (RP) Technician. The individual adjusted the setpoint dials on the alarming dosimeter to the required setpoint but did not either cycle the dosimeter off and on, or depress the reset buttons. These subsequent actions are required for the newly dialed setpoints to be entered into the dosimeter's alarm circuit. The individual was aware of these required actions but forgot to perform them. The individual had entered new setpoints into the dosimeter in the proper sequence just prior to this occurrence.

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

The RP Technician was counseled in accordance with the APS positive discipline program.

On August 24, 1992, the Unit 1 RP Manager issued a memorandum addressing the event, the personal error, and the corrective actions to Unit 1 management for dissemination to personnel. The memorandum also delineated the priorities for the Unit 1 RP technicians at the access control point.

On August 25, 1992, the Unit 1 RP Manager issued a detailed letter of instruction to Unit 1 RP personnel stressing attention to detail and avoidance of personnel errors, and the priorities for the Unit 1 RP Technicians at the access control point.

The Site RP Manager has made the priorities discussed above a sitewide policy. A memorandum was issued reiterating these priorities. This was distributed to unit management personnel to facilitate understanding and cooperation when working with the RP Technicians.

Corrective Steps That Will Be Taken to Avoid Further Violations

APS believes the actions taken above are adequate to prevent recurrence.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on August 20, 1992, when the alarming dosimeter was properly reset in accordance with the Radiological Exposure Permit.