

NOV 22 1985

Docket No. 50-528

Arizona Nuclear Power Project
P. O. Box 52034
Phoenix, Arizona 85072-2034

Attention: Mr. E. E. Van Brunt, Jr.
Executive Vice President
Project Director

Gentlemen:

Thank you for your letter dated November 1, 1985, informing us of the steps you have taken to correct the items which we brought to your attention in our letter dated October 4, 1985. Your corrective actions will be verified during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

Original signed by

R. J. Potts

D. F. Kirsch, Acting Director
Division of Reactor Safety & Projects

bcc w/copy letter dated 11/1/85:
Mr. Martin, RV
RSB/Document Control Desk (RIDS)

REGION V/dot

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ANPP-33897-EEVB/FJH
November 1, 1985

U. S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Attention: Mr. D. F. Kirsch, Acting Director
Division of Reactor Safety and Projects

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Docket No. STN 50-528 (License No. NPF-41)
Notice of Violation 50-528/85-26/01
File: 85-019-026;D.4.33.2

Reference: NRC Inspection Report 50-528/85-26, 50-529/85-27 Letter from
D. F. Kirsch to E. E. Van Brunt, Jr., dated October 4, 1985

Dear Sir:

This letter refers to the inspection conducted by Messrs. R. Zimmerman, C. Bosted, and G. Fiorelli from August 1 - September 8, 1985. Based upon the results of the inspection, a Notice of Violation, concerning verification that unlocked fire doors without electrical supervision are closed, was issued to ANPP as described in the referenced letter. Our response is provided as Attachment A.

Very truly yours,

E. E. Van Brunt, Jr.
Executive Vice President
Project Director

EEVB/FJH/dlm

Attachment

cc: A. C. Gehr
E. A. Licitra
R. P. Zimmerman

85-019-026-335

IG-01

APPENDIX A

NOTICE OF VIOLATION

Arizona Nuclear Power Project
P. O. Box 52034

Docket No. 50-528
License No. NPF-41

As a result of the inspection conducted during the period August 1 through September 8, 1985, and in accordance with NRC Enforcement Policy, 10 CFR Part 2, Appendix C, the following violation was identified:

Technical Specification 3.7.12 requires that each unlocked fire door without electrical supervision located in fire rated assembly penetrations shall be verified closed at least once per 24 hours.

During the period April 17 through August 11, 1985, three unlocked fire doors without electrical supervision (J-111, A-336 and J-126) located in fire rated assembly penetrations, were not verified to be closed, and a fourth door (A-203) was verified closed on a seven day cycle rather than once per 24 hours, as required.

This is a repeat Severity Level IV Violation (Supplement 1).

RESPONSE TO NOTICE OF VIOLATION (50-528/85-26/01)I. Corrective Steps Taken and Results Achieved

The conditions as stated in the violation were addressed in LER No. 85-059-00 and the following corrective actions were taken to resolve this issue:

1. A comprehensive review and walkdown of all fire doors required by the Technical Specifications was completed on September 4, 1985; the review resulted in the identification of five unlocked fire doors that were not being surveilled as required by Surveillance Requirement 4.7.1.2.2d.
2. As a result of the comprehensive review and walkdown results from above, a procedure change was incorporated on September 4, 1985 to include all locked fire doors in the 24 hour surveillance procedure "Unlocked Fire Door Position Verification" (14ST-1ZZ24). This will ensure any fire doors thought to be locked will be verified closed as required.
3. A review of the station "Procedure Review and Approval Process" administrative controls was conducted to identify measures necessary to preclude the omission of Procedure Change Notices (PCN's) from subsequent revisions of associated procedures. The review indicated that the procedure "Review and Approval of Station Procedures" (70AC-0ZZ02) did provide instructions for assuring that all PCN's outstanding were incorporated into revisions to the procedure. However, the procedures were not considered to have explicit control and are in the process of being revised; this is scheduled to be completed prior to January 1, 1986.

II. Corrective Steps Taken to Prevent Recurrence

The inclusion of all locked fire doors in the 24 hour surveillance procedure "Unlocked Fire Door Position Verification" (14ST-1ZZ24) will ensure any fire doors thought to be locked will be verified closed as required.

The station procedure changes in progress, on administrative controls for the procedure review and approval process, will more explicitly define responsibilities in the area of PCN's being included in procedure revisions.

III. Date When Full Compliance Will Be Achieved

Full compliance was achieved on September 4, 1985 with the above stated change to the 24 hour surveillance procedure "Unlocked Fire Door Position Verification" (14ST-1ZZ24).

The changes to the station procedures on administrative controls for the procedure review and approval process will be completed prior to January 1, 1986.