



A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear
Generating Station

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102-06164-DCM/DFH
April 07, 2010

Attn: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Docket Nos. STN 50-528/529/530
Unanticipated Result for an FFD Performance Test Sample**

Pursuant to 10 CFR 26.719(c)(1), Arizona Public Service Company hereby provides, as an enclosure to this letter, a report of an unanticipated result for a Fitness for Duty (FFD) performance test sample.

On February 18, 2010, the PVNGS FFD collection facility received, from a Department of Health and Human Services (HHS) certified laboratory, a performance test result that was not consistent with the expected result for a positive challenge sample.

Palo Verde completed its investigation on March 8, 2010, but could not determine the cause for the HHS-certified laboratory test failure. Results of the investigation are documented in the enclosure to this letter.

No commitments are being made to the NRC by this letter. Should you need further information regarding this submittal, please contact Marianne Webb, Compliance Section Leader, at (623) 393-5730.

Sincerely,

DCM/MNW/DFH/gat

Enclosure

cc:	E. E. Collins Jr.	NRC Region IV Regional Administrator
	J. R. Hall	NRC NRR Project Manager
	L. K. Gibson	NRC NRR Project Manager
	R. I. Treadway	NRC Senior Resident Inspector for PVNGS

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NRR

ENCLOSURE

Unanticipated Result for an FFD Performance Test Sample

Description

In accordance with 10 CFR 26.168, the Palo Verde Fitness for Duty (FFD) Program submits performance test samples to a Department of Health and Human Services (HHS) certified laboratory for analysis.

On December 28, 2009, a performance test for a false negative challenge sample for Phencyclidine (PCP) was sent to an HHS-certified laboratory (Lab 1) for initial testing in two sample bottles (A and B). On January 02, 2010, the expected result for the challenge sample was received from Lab 1.

On January 28, 2010, Palo Verde FFD requested sample bottle B to be sent to another HHS-certified laboratory (Lab 2) for analysis for reconfirmation. On February 04, 2010, Lab 2 failed to reconfirm the sample from bottle B. Palo Verde FFD personnel expected a positive result for the challenge sample; however, Lab 2 failed to reconfirm the presence of PCP. Palo Verde requested a retest of the challenge sample from sample bottle B and on two retests Lab 2 failed to reconfirm the presence of PCP.

To verify the challenge sample was not altered during handling, the remaining content of sample bottle B from Lab 2 was sent to a third HHS-certified laboratory (Lab 3). The results of the challenge sample analyzed by Lab 3 reconfirmed the presence of PCP. The unanticipated performance test result from Lab 2 represented an unsatisfactory condition that was investigated by Palo Verde. Pursuant to 10 CFR 26.719(c)(1), a report of the condition and corrective actions taken or planned is required within 30 days of completion of the investigation.

Investigation Results

Palo Verde FFD contracts sample analysis for the FFD program to HHS-certified laboratories. When the unanticipated reconfirmation test result was received from Lab 2, Palo Verde requested Lab 2 to perform an investigation to determine the cause of the failure and provide an explanation of corrective actions taken. Through their investigation, Lab 2 concluded that the challenge sample had chromatographic interference with the quantification of the Phencyclidine ion. Since the chromatography data for the sample did not meet the standard laboratory acceptance criteria, the laboratory could not report the result as reconfirmed. Lab 2 discounted issues with analytical procedures utilized by the laboratory since the laboratory had experienced no previous issues with proficiency test samples containing Phencyclidine. Lab 2 recommended contacting the manufacturer of the blind sample to identify if any other laboratories were experiencing similar problems. Since Lab 1 and Lab 3 did not have any problems confirming the positive challenge sample, Palo Verde FFD determined the sample manufacturer was providing acceptable quality blind samples.

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On March 8, 2010, based on phone correspondence between Lab 2 and Palo Verde FFD and on the Lab 2 investigation results, the investigation was considered to be closed even though a cause was not identified.

Actions Taken

Palo Verde FFD staff has removed Lab 2 from the Palo Verde approved vendors list and will seek a replacement HHS-certified laboratory.