10 CFR 26.719(c)(1)

A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear Generating Station

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102-06408-DCM/DFH
September 15, 2011

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 August 2, 2011, members of the Palo Verde Medical Review Officer (MRO) staff received, from a Department of Health and Human Services (HHS) certified laboratory, an unanticipated performance test result that was not consistent with the expected result for an adulterated sample.

Palo Verde completed its investigation on August 16, 2011, and determined the cause for the HHS-certified laboratory test failure was a clerical error. Results of the investigation are documented within 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,

FOR D. C. MIMS

DCM/MNW/DFH/gat

Enclosure

cc: E. E. Collins Jr. NRC Region IV Regional Administrator
L. K. Gibson NRC NRR Project Manager for PVNGS (electronic / paper)
J. R. Hall NRC NRR Senior Project Manager (electronic / paper)
M. A. Brown NRC Senior Resident Inspector for PVNGS

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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 July 29, 2011, a single adulterated blind performance test specimen was sent to an HHS-certified laboratory for testing. On August 02, 2011, the laboratory reported the result of the blind performance test specimen as "invalid." The laboratory result was reviewed by members of the Palo Verde Medical Review Officer (MRO) staff, including the site's MRO, who determined the laboratory incorrectly characterized the blind performance test specimen. The test result was contrary to the expected characterization for an "adulterated" specimen. The pH for the blind performance test was correctly documented at 1.10; but was reported to Palo Verde as "invalid." Notification of the error was made by a member of the Palo Verde MRO staff to the certifying scientist of the HHS-certified laboratory, who then reviewed the specimen screening and confirmed the error.

Investigation Results

The investigation identified that the laboratory test equipment defaults to an "invalid" result when the parameter of an area tested falls outside its normal range. It is then the responsibility of the certifying scientist to evaluate the reading and determine the characterization of the specimen based on its value. In this case, a pH level of 1.10 was correctly documented, but the scientist failed to annotate the low pH reading as "adulterated."

Actions Taken

As an immediate corrective action, the HHS-certified laboratory amended the report correcting the error to reflect the test specimen was "adulterated" with the abnormal pH level. The amended report was received by a member of the Palo Verde MRO staff on August 03, 2011.

To prevent recurrence, the HHS-certified laboratory developed a reference guide to assist the certifying scientist with the characterization of specimens that are identified as "invalid" during specimen testing.