

Arizona Public Service Company

ANPP-31968-EEVB/WFO/WB5
February 28, 1985

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

REGION V IRE

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-34)
Notice of Violation 50-528/83-34/13 Electrical Raceways:
Safety-Related/Nonsafety-Related Cable Separation
File: 85-019-026; D.4.33.2

- References:
1. Letter from E. E. Van Brunt, Jr., APS, to Director, Office of Inspection and Enforcement, NRC, dated January 31, 1983, (ANPP-28749).
 2. Letter from J. B. Martin, NRC, To T. G. Woods, Jr., APS, dated December 12, 1983.
 3. NRC Construction Appraisal Inspection 50-528/83-34, dated November 11, 1983.

Dear Sir:

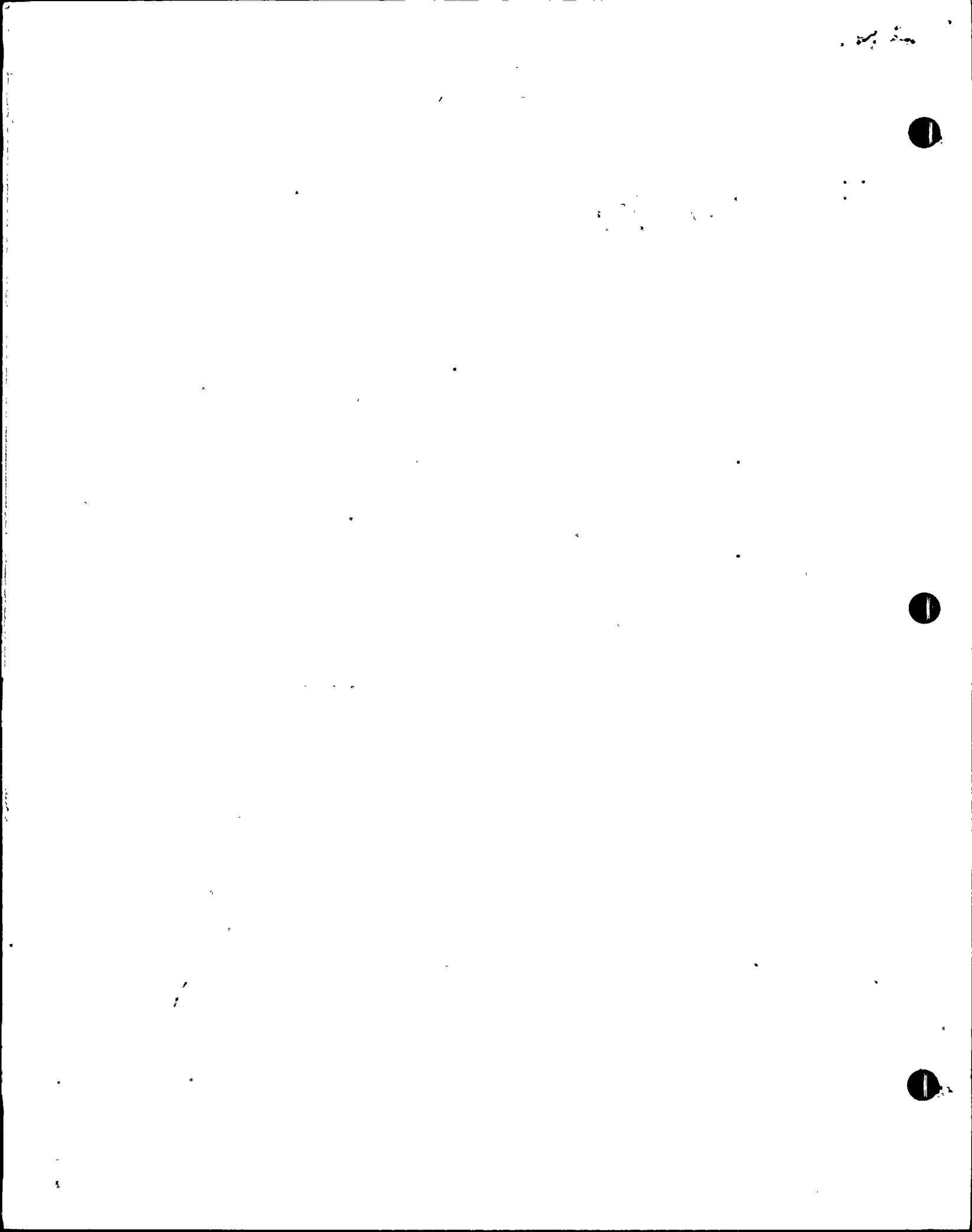
This letter is provided to discuss a commitment made to the NRC in Reference (1) (Attachment D in response to Violation II.A.2). This commitment indicated that the final Construction QC walkdown inspections for conduit-to-conduit and conduit-to-tray separation be completed by Construction and Quality Control prior to fuel load. As a result of the commitment, procedure WPP/QCI 31.0, "Subsystem Transfer Acceptance," was changed to provide a mechanism for the identification and tracking of these walkdown requirements. The procedural change and the identification of a sample of the required walkdowns were verified during ANPP Audit No. 84-009 which was conducted May 15 - June 15, 1984.

Prior to fuel load, it was recognized that the walkdowns identified as fuel load items had not yet been fully completed (i.e., QC Inspection). At that time, plant management evaluated the potential effects on safety if the walkdowns did not have final QC Inspection prior to fuel load. This evaluation was performed with the knowledge that preliminary walkdowns had been conducted by the Area Field Engineer. It was concluded that the lack of completion of the QC Inspection of five remaining walkdowns would not affect the safety of the plant for entry into Mode 5 or 6; in addition, firewatches were established in the affected areas.

Attachment "A" lists the walkdowns which did not receive final QC inspection prior to fuel load and the applicable completion dates or schedules. Although this commitment for cable separation walkdowns was not fully met at fuel load, the situation had been identified, evaluated, and determined to have no effect on safety prior to Mode 5 or 6 entry.

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Q PDR

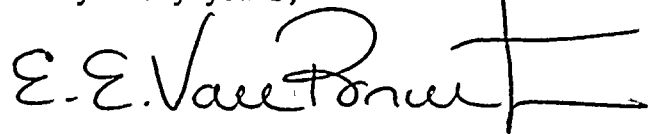
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The walkdown inspections and any additional work identified will be completed prior to entry into Mode 4. Action has been taken to ensure other commitments made in response to Reference (2) have been met. Although the walkdown commitment was not fully met, it can be concluded that prudent decisions were made to protect the health and safety of the public.

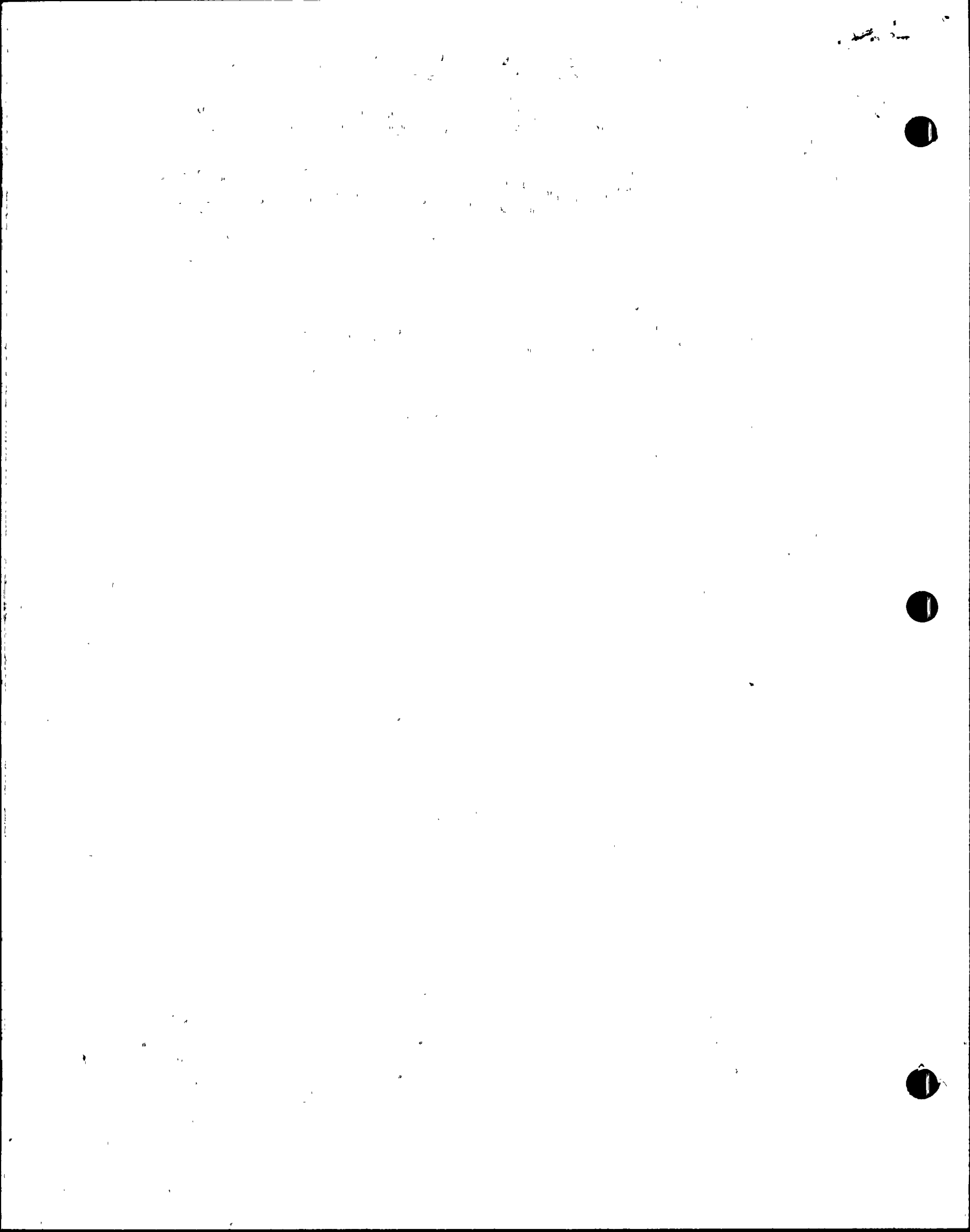
Very truly yours,



E. E. Van Brunt, Jr.
APS Vice President
Nuclear Production
ANPP Project Director

EEVB/WFQ/WEI/mb
Attachment

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



ATTACHMENT "A"

ELECTRICAL SUBSYSTEMS WALKDOWNS

<u>SUBSYSTEM</u>	<u>SYSTEM ACCEPT</u>	<u>WPL/IIL ITEM NO.</u>	<u>AFE WALKDOWN</u>	<u>QC WALKDOWN RELEASE</u>
1ZC08 - Containment Building All Levels	12/12/84	467	10/01/84	01/10/85
1ZJ01 - Control Room, -- Conference Rooms, Offices, Kitchens, Toilets, and Welding Recep- tacles	12/12/84	114	11/20/84	01/14/85
1ZJ18 - Lower Cable Spreading Room	12/12/84	192	10/01/84	03/01/85 (Forecast)
1ZJ23 - Control Building & Aux Building Interface	12/12/84	125	10/02/84	01/28/85
1ZY01 - Outside Areas	12/12/84	585	12/09/84	02/27/85 (Forecast)

