

APPENDIX A  
NOTICE OF VIOLATION

Arizona Public Service Company  
Palo Verde Nuclear Generating Station  
Unit 1

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

During an NRC inspection conducted on October 26-30, 1987, 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 (1987), the violation is listed below:

Technical Specification 6.2.2.2 states, in part:

"6.2.2.2 The unit staff working hours shall be as follows:

"a. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., Senior Reactor Operators, Reactor Operators, radiation protection technicians, auxiliary operators, and key maintenance personnel..."

"...during extended periods of shutdown for refueling, major maintenance, or major plant modifications, on a temporary basis, the following guidelines shall be followed..."

"...An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time..."

"Any deviation from the above guidelines shall be authorized by the PVNGS Plant Manager or his designee who is at supervisory level or above, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation...."

Contrary to the above, two Radiation Protection Technicians worked 84 hours each during a seven-day period on October 10-16, 1987, and on October 13-19, 1987, respectively, without prior authorization at the supervisory level or above, and without documentation of the basis for granting the overtime work.

This is a Severity Level V violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Palo Verde Nuclear Generating Station is hereby required to submit a written statement or explanation to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region V, within 30 days of the date of the letter transmitting this Notice. This reply should be

clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION



Frank A. Wenslawski, Chief  
Emergency Preparedness and  
Radiological Protection Branch

Dated at Walnut Creek, California  
this *4th* day of *December*, 1987