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102-00572-EEVB/TDS  
December 31, 1987

NRC Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Unit 1  
Docket No. STN 50-528 (License NPF-41)  
Response to Notice of Violation: 50-528/87-38-01  
File: 87-056-026

Reference: Letter from F. A. Wenslawski (NRC) to E. E. Van Brunt, Jr. (ANPP),  
dated December 4, 1987. NRC Inspection Reports 50-528/87-38,  
50-529/87-37 and 50-530/87-39

Dear Sirs:

This letter is provided in response to the inspection conducted by Messrs. J. Russell and G. Cicotte on October 26-30, 1987. Based upon the results of the inspection, a violation of NRC requirements was identified. The violation is discussed in Appendix A of the referenced letter.

The violation and ANPP's response are provided in the attachment to this letter.

In addition to addressing the Notice of Violation, ANPP has evaluated the comments provided in the referenced letter concerning the need for additional management attention in the radiological controls area. Based on your letter and comments provided in a subsequent inspection conducted by personnel from your office, ANPP executive management has evaluated the overall management attention in this area. ANPP believes that the management restructuring accomplished during the recent reorganization will provide additional management involvement. The assignment of unit specific Radiation Protection Managers and a separate professional level group that provides standards for and oversight of radiological controls for all three units will provide more direct access and overview for the field technicians. As a result, the necessary direct supervision to produce an increased level of attention to detail should be created.

If you have any questions regarding this response, please contact Mr. T. D. Shriver of my staff at (602) 393-2521.

Very truly yours,

*E. E. Van Brunt, Jr.*

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

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8801070457



J. B. Martin  
Page 2 of 2

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EEVB/TDS/kj

Attachment

cc: O. M. DeMichele (all w/attachment)  
J. G. Haynes  
J. B. Martin  
J. R. Ball  
E. A. Licitra  
A. C. Gehr

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).

1. REASON FOR THE VIOLATION

During the course of the inspection, the inspectors reviewed the time records for the Radiation Protection (RP) technicians and identified two individuals who apparently exceeded the overtime limitations imposed by PVNGS Technical Specification (T.S.) section 6.2.2.2. The records reviewed are used for pay purposes. ANPP's initial investigation verified the inspectors' observations. In order to ensure the adequacy of the information utilized in the investigation a cross check was performed matching the time records against an ACAD transaction log. An ACAD is an automated control access device used to gain entry into the protected and vital areas. The identified technicians would be required to log in and out of their official work station using one of these devices. The review of the ACAD transaction log identified discrepancies in the manually maintained time records. As a result, it has been determined that the two (2) individuals identified in the Notice of Violation did not exceed the established overtime limitations and were in compliance with T.S. 6.2.2.2. Therefore, in this case no violation of regulatory requirements could be substantiated.

However, interviews were conducted with Radiation Protection (RP) management personnel responsible for the overview and control of overtime worked by both ANPP direct employees and contractors. Although the controls were properly applied in the event

cited, it was concluded that the procedural controls themselves did not provide sufficiently definitive guidance to ensure compliance with current regulatory requirements in this area.

In January, 1987, Administrative Control procedure 10AC-OZZ07 "Overtime Limitations" was revised in response to discussions held with the NRC and subsequent recommendations that were provided. However, the wording used in the procedure, i.e.: "Additionally the requirements of this procedure apply to ANPP personnel performing in the capacity of any of the positions listed.", could be interpreted to inappropriately exclude contract personnel from the controls .

Although the specific violation cited was not substantiated, the discussions held with responsible RP management personnel and the review of existing procedural controls indicate the potential existed for this type of violation to occur.

## II. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

As a precautionary measure the responsible Radiation Protection (RP) management personnel were advised of the proper interpretation of the controls specified in Administrative Control procedure 10AC-OZZ07. As a result of this action, the overtime of applicable contract personnel assigned to the RP Department is being monitored by the responsible supervision.

III. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

In order to eliminate potential misinterpretations of the current regulatory guidance in this area, a procedural revision was approved on December 23, 1987. The revision includes specific wording that contractors are included along with ANPP personnel under the overtime controls for personnel performing safety-related functions as discussed in PVNGS Technical Specification 6.2.2.2

As a prudent action a sample review of other contract RP technicians work hours will be conducted. In any instance where it is found that a contract RP technician exceeded the overtime limitations, a review of the accuracy of the safety-related work performed during that period will be conducted where possible. Corrective action, if necessary, will be taken based upon the results of this review.

IV. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The effective date of the procedural revision is scheduled for January, 1988. The review of previous contract RP technicians' work hours is currently scheduled for completion in February, 1988.



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 50-528/87-38.

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cc: O. M. DeMichele (all w/attachment)  
J. G. Haynes  
J. B. Martin  
J. R. Ball  
E. A. Licitra  
A. C. Gehr

bcc: J. G. Haynes (7038)  
J. D. Driscoll (6165)  
R. M. Butler (6102)  
J. E. Allen (7106)  
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