

ENCLOSURE 1

NOTICE OF VIOLATION

Arizona Public Service Company  
Palo Verde Nuclear Generating Station

Docket Nos.: 50-529  
50-530  
License Nos.: NPF-51  
NPF-74

During an NRC inspection conducted on April 21 through June 1, 1996, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification 6.8.1 requires, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, Revision 2, requires, in part, written procedures for procedural adherence.

Procedure 01DP-OAP01, "Procedure Process," Revision 1, Step 6.2, requires, in part, that procedure users are responsible for adhering to the requirements of the procedure.

Contrary to the above, the inspectors identified two examples where licensee personnel, on different occasions, failed to adhere to the requirements of the procedure as evidenced by the following:

1. Procedure 40AL-9RK2B, "Panel B02B Alarm Responses," Revision 26, Window Number 2B09B, page 3 of 12, Step 3, prescribes, in part, that if the indicated pressure on SIN-PI-319 is greater than 1540 psig, then declare low pressure safety injection (LPSI) B inoperable; and page 7 of 12, Step 3, prescribes, in part, that if the indicated pressure on SIN-PI-339 is greater than 1540 psig, then declare LPSI A inoperable. On April 30, 1996, in Unit 2, when pressure on SIN-PI-319 exceeded 1540 psig, operators failed to declare LPSI B inoperable, and when pressure on SIN-PI-339 exceeded 1540 psig, operators failed to declare LPSI A inoperable. As a result, both trains of LPSI were inoperable for approximately 15 minutes.
2. Procedure 420P-2SG03, "Operating the Steam Generator (SG) Blowdown System," Revision 21, Section 6.3, "Performing High Rate Blowdown on SG 1 to the Main Condenser," provides instructions for realigning the blowdown system to the blowdown flash tank. On May 11, 1996, in Unit 2, the procedure was not used by an operator when realigning the blowdown system, and the system was left isolated. As a result, actual reactor power was slightly greater than indicated power and exceeded the licensed thermal limit by a small amount.

This is a Severity Level IV violation (Supplement I) applicable to Unit 2



- B. Technical Specification 6.8.1 requires, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, Revision 2, requires, in part, written radiation protection procedures for contamination control.

Procedure 75RP-ORP01, "Radiological Posting," Revision 13, Step 3.4.1, requires, in part, that areas identified as having contamination levels greater than 1000 disintegrations per minute per 100 square centimeters shall be posted with radiological warning sign(s) bearing the words "caution, contaminated area."

Contrary to the above, the inspectors identified three areas as having contamination levels greater than 1000 disintegrations per minute per 100 square centimeters that were not posted with radiological warning signs bearing the words "caution, contamination area." The examples were the following:

- On May 9, 1996, the floor under Unit 2 valve SIA-UV-655 had contamination levels as high as 15,000 disintegrations per minute per 100 square centimeters.
- On May 9, 1996, the floor under Unit 2 drain valve SIB-V555 had contamination levels as high as 70,000 disintegrations per minute per 100 square centimeters. In addition, the pipe cap downstream of valve SIB-V555 had contamination levels as high as 30,000 disintegrations per minute per 100 square centimeters.
- On May 16, 1996, the floor under Unit 1 valve SIA-UV-655 had contamination levels as high as 40,000 disintegrations per minute per 100 square centimeters.

This is a Severity Level IV violation (Supplement IV) applicable to Units 1 and 2.

Pursuant to the provisions of 10 CFR 2.201, Arizona Public Service Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (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, or, if contested, the basis for disputing the violation, (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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Arlington, Texas  
this *21<sup>st</sup>* day of *June* 1996

