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UNITED STATES

NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-8064

OCT 2 1999

Gregg R. Overbeck, Senior Vice President, Nuclear Arizona Public Service Company P.O. Box 52034 Phoenix, Arizona 85072-2034

SUBJECT: NRC 'INSPECTION REPORT NO. 50-528/99-11; 50-529/99-11; 50-530/99-11

Dear Mr. Overbeck:

This refers to the inspection conducted on June 14 through July 2, 1999, at the Palo Verde Nuclear Generating Station, Units 1, 2, and 3, facility. Additional review and inspection were performed in the Region IV Office until September 1, 1999. Supplemental onsite inspection was also conducted August 30 through September 2, 1999. This inspection assessed your containment spray system, 125Vdc power system, and portions of your containment isolation systems for conformance to applicable regulatory requirements for the Palo Verde Nuclear Generating Station. The enclosed report presents the results of this inspection.

At the end of the first onsite period of the inspection, the team leader conducted an exit meeting with you and members of your staff on July 2, 1999. Following this exit meeting, your staff provided the inspection team with additional requested information. New information was provided to the team in several telephonic conferences and during the supplemental onsite inspection. This new information changed some of the preliminary findings discussed in the exit meeting, necessitating a followup exit meeting that was conducted via teleconference on September 30, 1999.

Overall, we concluded that the containment spray and 125Vdc systems conformed to their design and licensing bases and were capable of performing their intended safety functions. However, we identified numerous errors in design calculations, procedures, and the Updated Safety Analysis Report. While none of these errors individually constituted operability problems, the number of issues revealed problems in the implementation of your design control program which, under different circumstances, may have been more significant. Examples of problems identified by the team included: (1) improper assumptions, references, and input associated with design calculations; (2) inconsistencies among the Updated Final Safety Analysis Report, design basis calculations, setpoints, and the installed configuration; and (3) failure to translate changes to design basis calculations, drawings, and procedures. Some of these errors appeared to have been caused by a lack of a fully effective process for identifying the interrelationship between calculations.

The team identified several examples in which your engineering staff failed to follow through completely with changes to design basis calculations resulting from changes in the source calculations or other inputs. One potential cause of this failure is the practice of relying on

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engineering judgement to determine whether the individual significance of a change warrants an update to the affected calculations. While such changes may be minor, the collective impact, which because of your current practices may not be recognized by your staff, could result in unintended or unacceptable degradations. Accordingly, we stress that revising design basis calculations to reflect changes and modifications, regardless of the impact of each individual change, is an essential element in the maintenance of your plant's design basis. We, therefore, encourage you to review your policies, processes, and practices to ensure that the plant's design basis and licensing basis is appropriately maintained.

Based on the results of this inspection, the NRC has determined that violations of NRC requirements occurred, all of which are being treated as noncited violations, consistent with Appendix C of the Enforcement Policy. The noncited violations are described in the subject inspection report. If you contest any of the violations or severity level of the noncited violations, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with copies to the Regional Administrator, Region IV; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Palo Verde Nuclear Generating Station.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

Dr. Dale A. Powers, Chief

Engineering and Maintenance Branch

Division of Reactor Safety

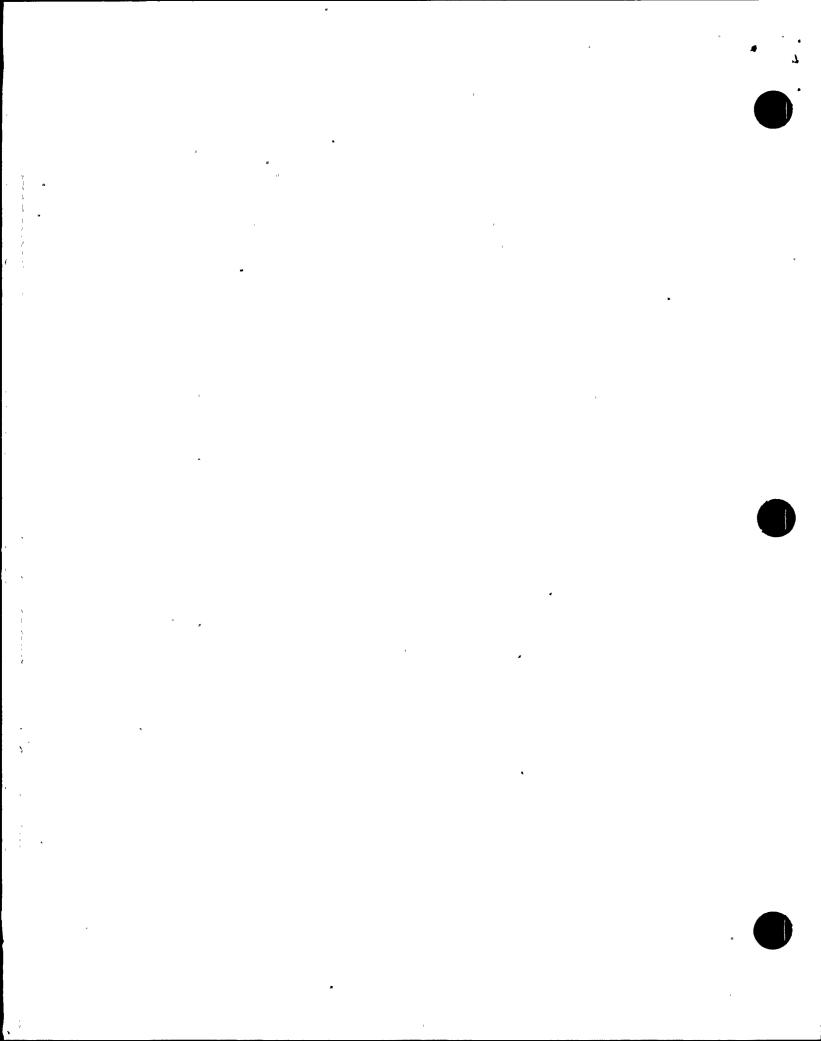
Docket Nos.: 50-528; 50-529; 50-530 License Nos.: NPF-41; NPF-51; NPF-74

Enclosure:

NRC Inspection Report No.

50-528/99-11; 50-529/99-11; 50-530/99-11

cc w/enclosure: Steve Olea Arizona Corporation Commission 1200 W. Washington Street Phoenix, Arizona 85007



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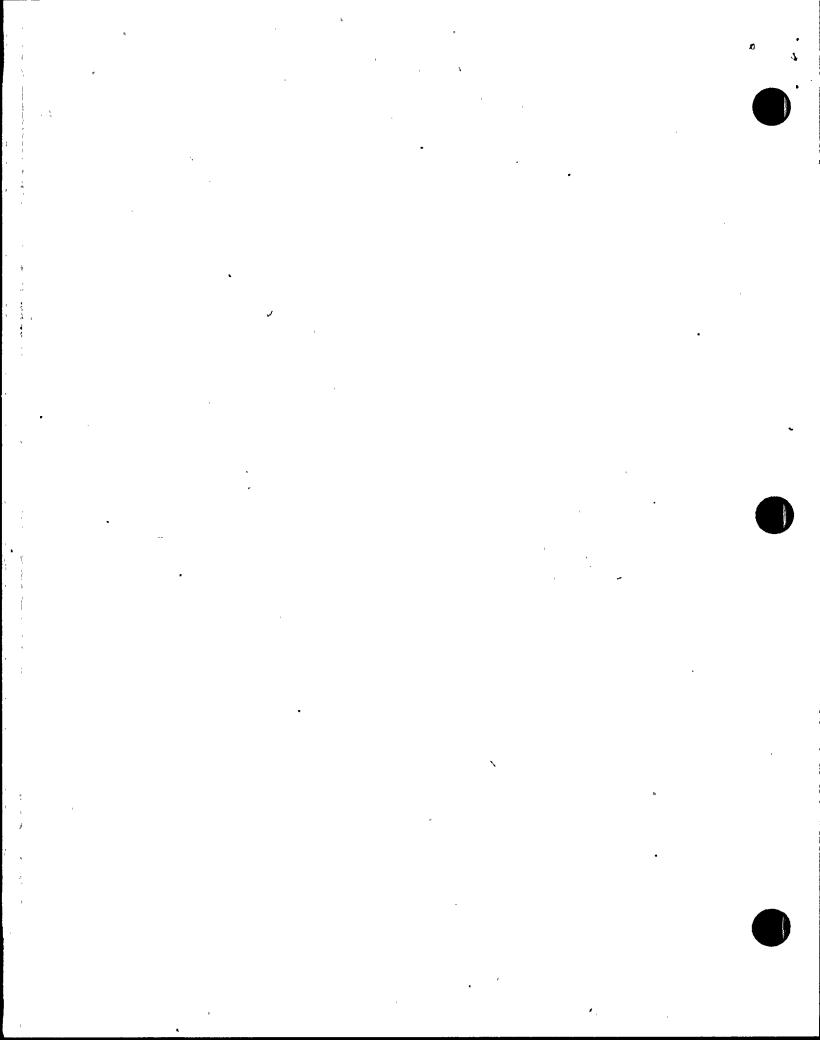
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E-Mail report to T. Frye (TJF)

E-Mail report to D. Lange (DJL)

E-Mail report to NRR Event Tracking System (IPAS)

E-Mail report to Document Control Desk (DOCDESK)

E-Mail report to Richard Correia (RPC)

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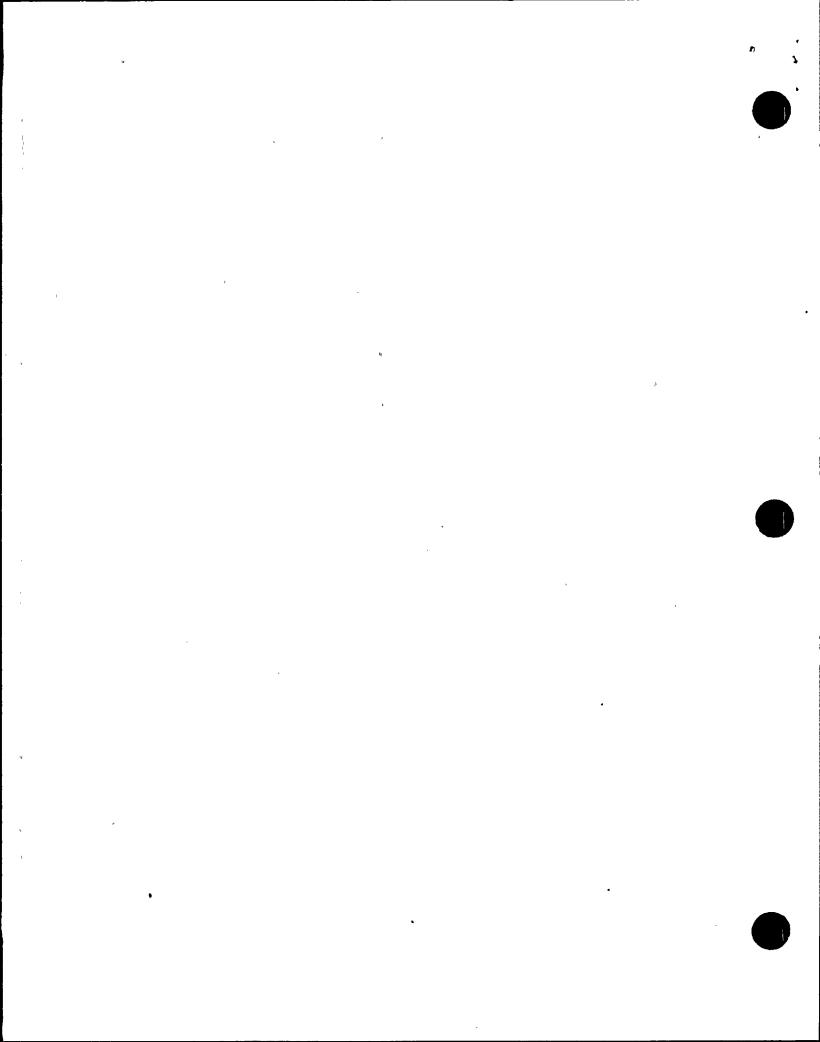
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