



Arizona Nuclear Power Project

P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

102-00968-DBK/TDS/KLMC
October 7, 1988

DONALD B. KARNER
EXECUTIVE VICE PRESIDENT

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Reference: Letter from R. A. Scarano, NRC, to D. B. Karner, ANPP, dated
September 7, 1988; Subject: NRC Inspection of Palo Verde Units 1,
2 and 3 (50-528/88-27, 50-529/88-26 and 50-530/88-25)

Déar Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Docket Nos. STN 50-528 (License No. NPF-41)
STN 50-529 (License No. NPF-51)
STN 50-530 (License No. NPF-74)
Response to Notice of Violation, 50-528/88-27-02, 50-529/88-26-02
and 50-530/88-25-02
File: 88-070-026

This letter is provided in response to a routine inspection conducted by
Messrs. M. Cillis and W. K. Tenbrook of Region V from August 1 through August
11, 1988. Based on 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. If you should have any questions regarding this response, please
contact Mr. Timothy Shriver of my staff at (602) 393-2521.

DBK/TDS/KLMC/kj

Attachment

- cc: E. E. Van Brunt, Jr. (all w/attachment)
- J. G. Haynes
- ~~J. B. Martin~~
- T. J. Polich
- T. L. Chan
- M. J. Davis
- A. C. Gehr

10 : 01 A/O 14 OCT 1988

RECEIVED
NRC
REGION V

8810120182-5PP



Appendix A

Notice of Violation

Arizona Public Service Company
Palo Verde Nuclear Generating Station
Unit 2

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

During an inspection conducted on August 1-11, 1988, three violations of NRC requirements were identified. Two of the violations will be the subject of separate correspondence. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the remaining violation is listed below:

10 CFR 50.59(b)(1) states in part, that: "The licensee shall maintain records of changes in the facility...made pursuant to this section, to the extent that these changes constitute changes in the facility as described in the safety analysis report.... These records must include a written evaluation...."

Sections 11.4 and 12.5 of the licensee's Final Safety Analysis Report (FSAR) identify systems and facilities that are within the site boundary that have been approved for handling and processing of radioactively contaminated material.

Contrary to the above, Trailer 3-2 was recently converted into a respiratory processing facility. At the time of the inspection, the trailer was being used to temporarily store and process radioactively contaminated respirators. As of August 11, 1988, the licensee had not performed a written safety evaluation addressing the processing of radioactive equipment in Trailer 3-2.

This is a Severity Level IV Violation (Supplement 1).



RESPONSE TO NOTICE OF VIOLATION

A. Reason for Violation

In response to questions raised by NRC inspectors during a routine inspection conducted on August 1 through August 11, 1988, ANPP initiated a 10CFR50.59 review in accordance with procedure 79AC-9ZZ07, "10CFR50.59 Review and Evaluation", to determine if the placement of trailer 3-2 and the activities being conducted in the trailer could constitute an unreviewed safety question. In conjunction with the initiation of the 10CFR50.59 review, an evaluation was conducted to identify the root cause of not performing the required evaluation.

On October 1, 1987, a Temporary Facilities Work Request was initiated to modify a trailer, install vendor supplied respiratory cleaning equipment in the trailer and install the trailer for use in its current location. On July 27, 1988, the modified trailer had been set up and was established as a Radiological Controlled Area (RCA) in accordance with procedure 75AC-9ZZ01, "Radiation Exposure and Access Control", and 75RP-0ZZ01, "Radiological Posting". The appropriate Radiation Exposure Permits (REP's) were issued in accordance with procedure 75RP-9ZZ44, "Radiation Exposure Permits" and the trailer was placed in service to decontaminate respirators.

A review of the process which controls the location and installation of temporary facilities identified that no internal requirements exist to perform an evaluation in accordance with 10CFR50.59 prior to the installation or modification of temporary facilities. The lack of

8

2



procedural guidance to perform the 10CFR50.59 evaluation when installing or modifying temporary facilities (trailers) external to the units has been identified as the root cause of the cited deficiency.

B. Corrective Steps Which Have Been Taken and Results Achieved

As immediate corrective action, an evaluation in accordance with 10CFR50.59 was initiated. The results of the evaluation concluded that no unreviewed safety question exists and that the installation of the trailer and the activities performed within the trailer are permissible under the provisions of 10CFR50.59.

C. Corrective Steps Which Will Be Taken to Avoid Further Violations

The violation issued addressed the performance of radiological work in locations other than those described in the Final Safety Analysis Report (FSAR). However, based upon the results of the evaluation discussed in section A of this response, ANPP has expanded the scope of the concern to ensure all aspects of the 10CFR50.59 evaluation process are considered.

As a result, the following actions are being taken:

- 1) A survey will be conducted to evaluate existing temporary facilities. Based upon the results of the survey, the appropriate 10CFR50.59 reviews will be conducted.
- 2) The 10CFR50.59 evaluation process will be evaluated by the Nuclear



Safety Group (NSG). The results of the evaluation will be forwarded to the responsible department for consideration with respect to enhancing the overall program.

- 3) The process which initiates the installation or modification of temporary facilities will be evaluated under the direction of the lead manager. Based upon the results of the evaluation, procedural guidance will be provided to specifically address the requirement to consider the applicability of ANPP's requirements under the provisions of 10CFR50.59.

D. Date When Corrective Actions Will Be Completed

Because the planned corrective actions are dependent upon the completion of the evaluations the following implementation schedule has been established:

- a) The survey discussed in section C item 1 of this response is currently scheduled for completion in November 1988. The required 10CFR50.59 evaluations will be initiated as appropriate.
- b) The evaluation of the 10CFR50.59 process discussed in section C item 2 of this response is currently scheduled for completion in December 1988.
- c) The process evaluation discussed in section C item 3 of this response is currently scheduled for completion in December 1988.



ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8810120182 DOC.DATE: 88/10/07 NOTARIZED: NO DOCKET #
 FACIL:STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528
 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530
 AUTH.NAME AUTHOR AFFILIATION
 KARNER,D.B. Arizona Nuclear Power Project (formerly Arizona Public Serv
 RECIP.NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 880907 ltr re violations noted in Insp Repts
 50-528/88-27,50-529/88-26 & 50-530/88-25.

DISTRIBUTION CODE: IE01D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 5
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:Standardized plant. 05000528 S
 Standardized plant. 05000529
 Standardized plant. 05000530 /

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	
	PD5 PD	1 1	CHAN,T	1 1	
	DAVIS,M	1 1	LICITRA,E	1 1	
INTERNAL:	ACRS	2 2	AEOD	1 1	
	DEDRO	1 1	NRR MORISSEAU,D	1 1	S
	NRR/DLPQ/PEB 11	1 1	NRR/DLPQ/QAB 10	1 1	
	NRR/DOEA DIR 11	1 1	NRR/DREP/EPB 10	1 1	
	NRR/DREP/RPB 10	2 2	NRR/DRIS DIR 9A	1 1	
	NRR/PMAS/ILRB12	1 1	NUDOCS-ABSTRACT	1 1	
	OE LIEBERMAN,J	1 1	OGC/HDS1	1 1	
	REG FILE 02	1 1	RES/DSIR DEPY	1 1	
	RGN5 FILE 01	1 1			
EXTERNAL:	LPDR	1 1	NRC PDR	1 1	
	NSIC	1 1			
NOTES:		1 1			

TOTAL NUMBER OF COPIES REQUIRED: LTTR 27 ENCL 27

R
I
D
S
/
A
D
D
S





Arizona Nuclear Power Project

P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

102-00968-DBK/TDS/KLMC
October 7, 1988

DONALD B. KARNER
EXECUTIVE VICE PRESIDENT

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Reference: Letter from R. A. Scarano, NRC, to D. B. Karner, ANPP, dated September 7, 1988; Subject: NRC Inspection of Palo Verde Units 1, 2 and 3 (50-528/88-27, 50-529/88-26 and 50-530/88-25)

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Docket Nos. STN 50-528 (License No. NPF-41)
STN 50-529 (License No. NPF-51)
STN 50-530 (License No. NPF-74)
Response to Notice of Violation, 50-528/88-27-02, 50-529/88-26-02
and 50-530/88-25-02
File: 88-070-026

This letter is provided in response to a routine inspection conducted by Messrs. M. Cillis and W. K. Tenbrook of Region V from August 1 through August 11, 1988. Based on 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. If you should have any questions regarding this response, please contact Mr. Timothy Shriver of my staff at (602) 393-2521.

DBK/TDS/KLMC/kj

Attachment

cc: E. E. Van Brunt, Jr. (all w/attachment)
J. G. Haynes
J. B. Martin
T. J. Polich
T. L. Chan
M. J. Davis
A. C. Gehr

8810120182 881007
PDR ADOCK 05000528
Q PDC

IEO1
1/1

Appendix A

Notice of Violation

Arizona Public Service Company
Palo Verde Nuclear Generating Station
Unit 2

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

During an inspection conducted on August 1-11, 1988, three violations of NRC requirements were identified. Two of the violations will be the subject of separate correspondence. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the remaining violation is listed below:

10 CFR 50.59(b)(1) states in part, that: "The licensee shall maintain records of changes in the facility...made pursuant to this section, to the extent that these changes constitute changes in the facility as described in the safety analysis report.... These records must include a written evaluation...."

Sections 11.4 and 12.5 of the licensee's Final Safety Analysis Report (FSAR) identify systems and facilities that are within the site boundary that have been approved for handling and processing of radioactively contaminated material.

Contrary to the above, Trailer 3-2 was recently converted into a respiratory processing facility. At the time of the inspection, the trailer was being used to temporarily store and process radioactively contaminated respirators. As of August 11, 1988, the licensee had not performed a written safety evaluation addressing the processing of radioactive equipment in Trailer 3-2.

This is a Severity Level IV Violation (Supplement 1).

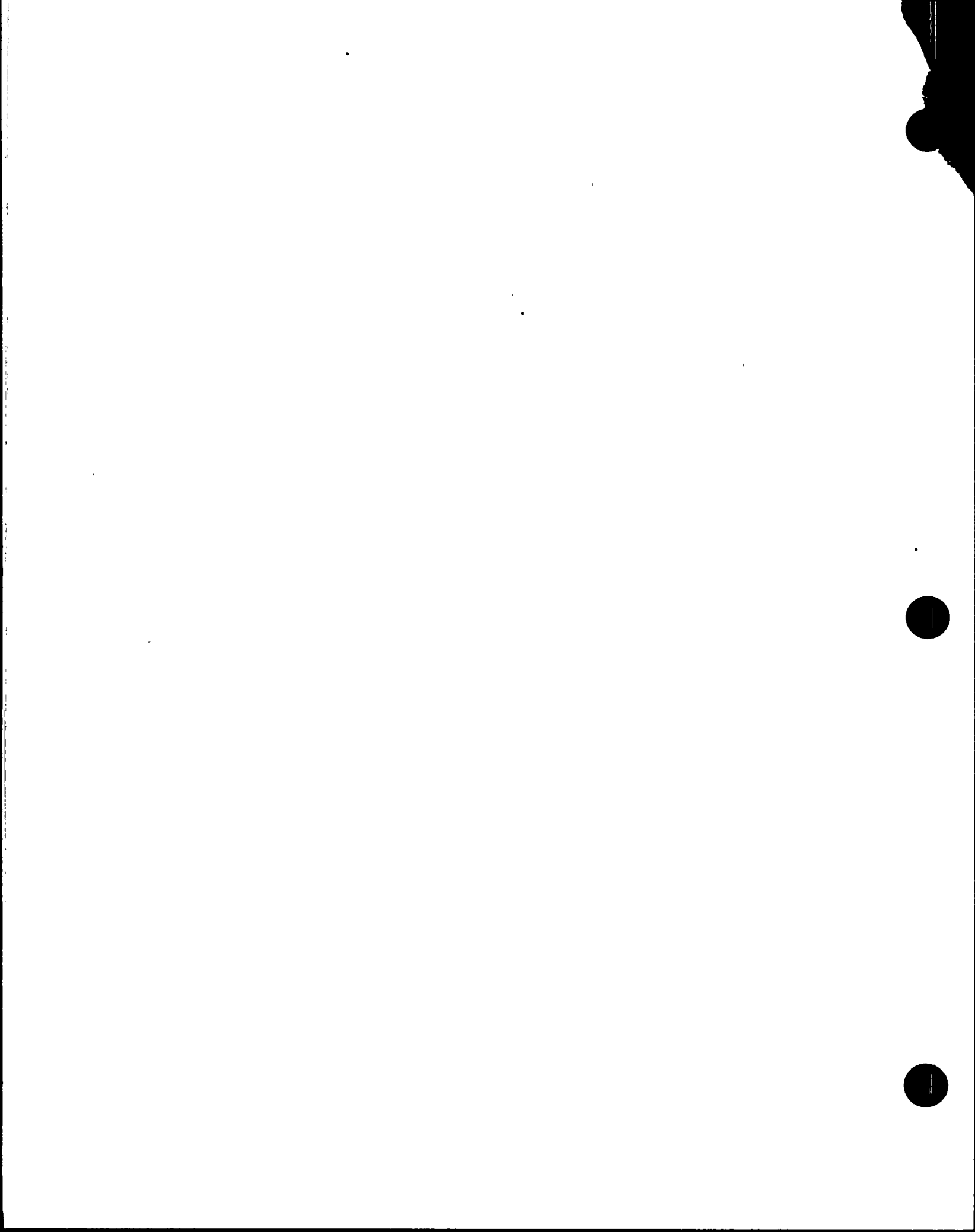
RESPONSE TO NOTICE OF VIOLATION

A. Reason for Violation

In response to questions raised by NRC inspectors during a routine inspection conducted on August 1 through August 11, 1988, ANPP initiated a 10CFR50.59 review in accordance with procedure 79AC-9ZZ07, "10CFR50.59 Review and Evaluation", to determine if the placement of trailer 3-2 and the activities being conducted in the trailer could constitute an unreviewed safety question. In conjunction with the initiation of the 10CFR50.59 review, an evaluation was conducted to identify the root cause of not performing the required evaluation.

On October 1, 1987, a Temporary Facilities Work Request was initiated to modify a trailer, install vendor supplied respiratory cleaning equipment in the trailer and install the trailer for use in its current location. On July 27, 1988, the modified trailer had been set up and was established as a Radiological Controlled Area (RCA) in accordance with procedure 75AC-9ZZ01, "Radiation Exposure and Access Control", and 75RP-0ZZ01, "Radiological Posting". The appropriate Radiation Exposure Permits (REP's) were issued in accordance with procedure 75RP-9ZZ44, "Radiation Exposure Permits" and the trailer was placed in service to decontaminate respirators.

A review of the process which controls the location and installation of temporary facilities identified that no internal requirements exist to perform an evaluation in accordance with 10CFR50.59 prior to the installation or modification of temporary facilities. The lack of



procedural guidance to perform the 10CFR50.59 evaluation when installing or modifying temporary facilities (trailers) external to the units has been identified as the root cause of the cited deficiency.

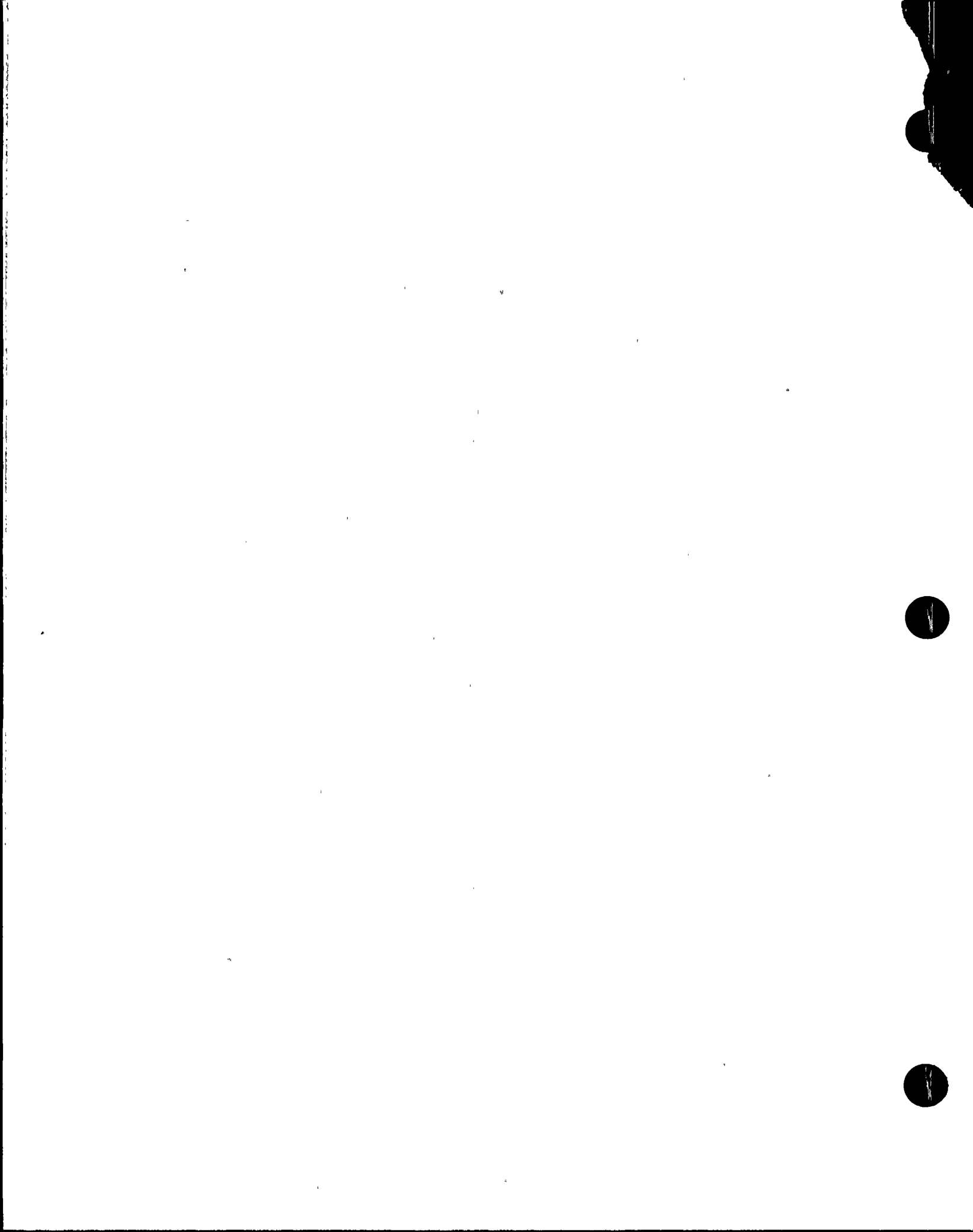
B. Corrective Steps Which Have Been Taken and Results Achieved

As immediate corrective action, an evaluation in accordance with 10CFR50.59 was initiated. The results of the evaluation concluded that no unreviewed safety question exists and that the installation of the trailer and the activities performed within the trailer are permissible under the provisions of 10CFR50.59.

C. Corrective Steps Which Will Be Taken to Avoid Further Violations

The violation issued addressed the performance of radiological work in locations other than those described in the Final Safety Analysis Report (FSAR). However, based upon the results of the evaluation discussed in section A of this response, ANPP has expanded the scope of the concern to ensure all aspects of the 10CFR50.59 evaluation process are considered. As a result, the following actions are being taken:

- 1) A survey will be conducted to evaluate existing temporary facilities. Based upon the results of the survey, the appropriate 10CFR50.59 reviews will be conducted.
- 2) The 10CFR50.59 evaluation process will be evaluated by the Nuclear



Safety Group (NSG). The results of the evaluation will be forwarded to the responsible department for consideration with respect to enhancing the overall program.

- 3) The process which initiates the installation or modification of temporary facilities will be evaluated under the direction of the lead manager. Based upon the results of the evaluation, procedural guidance will be provided to specifically address the requirement to consider the applicability of ANPP's requirements under the provisions of 10CFR50.59.

D. Date When Corrective Actions Will Be Completed

Because the planned corrective actions are dependent upon the completion of the evaluations the following implementation schedule has been established:

- a) The survey discussed in section C item 1 of this response is currently scheduled for completion in November 1988. The required 10CFR50.59 evaluations will be initiated as appropriate.
- b) The evaluation of the 10CFR50.59 process discussed in section C item 2 of this response is currently scheduled for completion in December 1988.
- c) The process evaluation discussed in section C item 3 of this response is currently scheduled for completion in December 1988.