

APPENDIX A

NOTICE OF VIOLATION

Arizona Nuclear Power Project
Palo Verde Units 1, 2, and 3

Docket Numbers 50-528, 50-529,
and 50-530
License Numbers NPF-41, NPF-51,
and NPF-74

During an NRC inspection conducted from March 20 through April 26, 1989, two violations of NRC requirements were identified. Violation A pertains to Unit 3, while Violation B pertains to Units 1, 2, and 3. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion V states in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Contrary to the above, on March 11, 1989, the licensee issued procedure 430P-3ZZ16, "RCS Drain Operations", which was not appropriate to activities affecting the quality of Reactor Coolant System (RCS) operation during reduced RCS inventory conditions. This procedure was not appropriate to the circumstances in that (1) Appendix D, Page 1 of 2, was an incorrect RCS level versus shutdown cooling flow correction curve for the RCS temporary level indication system configuration used, and (2) procedural provisions intended to prevent vortexing and air entrainment were ineffective, resulting in actual air entrainment even though procedural requirements were met.

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

- B. Technical Specification 6.8.1 states, in part: "Written procedures shall be established, implemented, and maintained covering ... the recommendations in Appendix A of Regulatory Guide 1.33, Revision 2, February, 1978 ..." (RG 1.33).

1. RG 1.33 is implemented in part by ANPP procedure 01AC-0AP01, Revision 0, "Format and Content of Nuclear Administrative and Technical Procedures," Section 3.4.2, which states: "Each document, or changes thereto, shall be reviewed and approved prior to use in accordance with 01AC-0AP02, "Review and Approval of Nuclear Administrative and Technical Procedures."

Contrary to the above, between September 1 and December 23, 1988, surveillance test procedures 72ST-9CL04, 73ST-9CL06, and 73ST-0CL07 were conducted using criteria which had not been reviewed and approved prior to use in accordance with 01AC-0AP02.



2. RG 1.33 paragraph 2, "General Plant Operating Procedures," recommends procedures for "Operation at Hot Standby."

RG 1.33 is implemented in part by ANPP procedure 410P-1SG01, Revision 8, "Main Steam," which requires in part, in paragraph 4.0, "Placing the Main Steam Lines in Service with the Main Steam Isolation Valves Open," completion of Appendix C, "Atmospheric Dump Valve Line Up." Appendix C indicates that accumulator isolation valve SG-V354 is to be open.

Contrary to the above, Unit 1 Atmospheric Dump Valve (ADV) No. 178 nitrogen isolation valve SG-V354 was closed on April 10, 1989, rendering the ADV inoperable from the Control Room.

3. RG 1.33, Paragraph 9, "Procedures For Performing Maintenance," recommends procedures for the control of maintenance, repair, and replacement.

RG 1.33 is implemented by ANPP procedure 30DP-9MP01, Revision 1, "Conduct of Maintenance," which states in paragraph 3.3.3 that "Maintenance and Contractor Support Personnel Shall Perform Work in Accordance With Approved Procedures and Work Documentation".

Contrary to the above, on April 4, 1989, the installation of a fuel line on the Unit 1 "A" emergency diesel was not performed in accordance with the instructions in approved work package No. 351776, resulting in the fuel line's disconnection from the cylinder while the engine was running.

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

Pursuant to the provisions of 10 CFR 2.201, Arizona Public Service Company is hereby required to submit to this office within thirty days of the date of this Notice, 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, and a copy to the NRC Resident Inspection office at the Palo Verde Nuclear Generating Station, 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 your response time for good cause shown.



FOR THE NUCLEAR REGULATORY COMMISSION

M. M. Mendonca

M. M. Mendonca, Acting Chief
Reactor Projects Branch

Dated at Walnut Creek, California
this 26th day of May 1989

