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SUBJECT: Responds to NRC 891209 ltr re violations noted in Insp Rept  
 50-528/89-52.

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EXECUTIVE VICE PRESIDENT  
NUCLEAR

102-01618-WFC/TRB/KR  
March 6, 1990

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

Reference: Letter from Robert J. Pate, Chief, Nuclear Material Safety and  
Safeguards Branch, NRC to W. F. Conway, Executive Vice President  
Nuclear, Arizona Public Service, dated February 5, 1990

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Unit 1  
Docket No. STN 50-528 (License No. NPF-41)  
Reply to Notice of Violation 50-528/89-52-04  
File: 90-070-026

This letter is provided in response to the unannounced routine inspection conducted by Mr. L. R. Norderhaug from December 9, 1989 through January 8, 1990. Based upon the results of the inspection, one (1) violation of NRC requirements was identified. The violation is discussed in Appendix A of the referenced letter. A restatement of the violation and APS's response are provided in Appendix A and Attachment 1, respectively, to this letter.

The referenced letter expresses concerns related to the events discussed in the Notice of Violation, and to other observations in the inspection report regarding security issues. The concerns related to the Notice of Violation are addressed in Attachment 1. Our response to the other observations is provided in Attachment 2.

Should you have any questions regarding this response, please contact me.

Very truly yours,



WFC/TRB/KR/kj

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Page 2

102-01618-WFC/TRB/KR  
March 6, 1990

**Attachments**

cc: J. B. Martin  
D. H. Coe  
T. L. Chan  
E. E. Van Brunt  
A. C. Gehr  
J. R. Newman



APPENDIX A

NOTICE OF VIOLATION

Arizona Nuclear Power Project  
P.O. Box 52034  
Phoenix, AZ 85072-2034

Docket No. 50-528  
License No. NPF-41

During a routine physical security inspection conducted from December 9, 1989, through January 8, 1990, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989), the violation is listed below:

Paragraph 2E of the Facility License No. NPF-41 for the Arizona Nuclear Power Project's Palo Verde Nuclear Generating Station, Unit 1 states, in part:

"APS shall fully implement and maintain in effect all provisions of the Commission approved physical security ... plan, including all amendments and revisions made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p), which are a part of this license."

The licensee's approved "Palo Verde Nuclear Generating Station Security Plan," dated October 1979, as amended, at Section 5.2.1 (entitled "Barrier Structure Description") states, in part: "Openings in vital area barriers not normally used for personnel access are tack welded shut or are of sufficient size and weight to be immovable solely by individuals... Vital Area Access barriers are of sufficient strength that the integrity of the wall is not lessened by such openings."

Contrary to the above, on December 6, 1989, the licensee discovered two separate paths of undetected access into Unit 1 containment from the Auxiliary Building vital area.

This occurrence is a repeat of uncompensated openings in vital area barriers previously discovered by the licensee on February 17, 1988, and on March 19, 1989, related to the Unit 1 fuel transfer canal and the Unit 3 containment equipment hatch, respectively.



ATTACHMENT 1

Reply to Notice of Violation 50-528/89-52-04

I. REASON FOR VIOLATION

On December 6, 1989, in accordance with an approved procedure, Control Room personnel notified Security that the Containment Refueling Purge Valves were about to be opened. The Containment Refueling Purge Valves are used to establish an environment required for safe access to the Containment during refueling operation. The paired inboard and outboard 42" purge valve openings in the supply ducts (CPA UV-3A and UV-2A) and the exhaust ducts (CPA UV-2B and UV-3B) could have provided a means of undetected access into Containment (vital area) from the Auxiliary Building (vital area). At approximately 1516 MST, the four Containment Purge Valves (CPA UV-2A, UV-3A, UV-2B and UV-3B) were opened.

At approximately 1606 MST on December 6, 1989, a PVNGS Security Officer, conducting a special patrol tour, observed that the purge valve pair in the exhaust ducts (CPA UV-2B and UV-3B) on the 140' elevation of the east Containment Wrap Penetration Room were open without the proper compensatory measures being established. The Security Officer immediately posted himself at the opening (CPA UV-3B) thereby establishing proper compensation for the vital area opening (CPA UV-2B). At approximately 1608 MST, the Security Officer verified with the Unit 1





Shift Supervisor that the purge valve pair in the supply ducts (CPA UV-3A and UV-2A) on the 140' elevation of the west Containment Wrap Penetration Room were also open. At approximately 1610 MST, another Security Officer was posted at the opening (CPA UV-2A) thereby establishing proper compensation for the vital area opening (CPA UV-3A) and terminating the event. The purge valve pairs (CPA UV-2A and UV-3A and CPA UV-2B and UV-3B) were open approximately 48 minutes and 52 minutes respectively without proper compensatory measures being established. Both officers remained posted at those areas until the refueling purge valves were closed at approximately 1837 hours.

Following discovery of the event, Containment Purge Valve outboard supply and exhaust ducts (CPA UV-2A and UV-3B) were visually verified to be unoccupied and the personnel in the Containment Building were verified to have proper access into the area. No unauthorized individuals were discovered in the Containment Building.

In response to this event, an investigation was initiated in accordance with the APS Incident Investigation Program to determine why proper compensatory measures had not been established when the purge valves were opened. A review of Unit 1 Control Room logs, Security logs and special patrol tour logs indicated that a previous similar event had occurred. At approximately 1631 MST on December 5, 1989, Unit 1 Control Room personnel initiated a Containment Refueling Purge. In accordance with an approved procedure, Control Room personnel notified Security



that the Containment Refueling Purge Valves were about to be opened. At approximately 1450 on December 6, 1989, Unit 1 Control Room personnel terminated the Containment Refueling Purge. In accordance with an approved procedure, Control Room personnel notified Security that the Containment Refueling Purge Valves were about to be closed. The purge valves were open approximately 22 hours and 19 minutes without proper compensatory measures being established.

Procedures for opening the Containment Purge Valves did not adequately convey that the intent of the requirement to contact Security prior to opening the purge valves was to ensure that Security had established proper compensatory measures prior to opening the purge valves. The investigation determined that the root cause of the event was that the procedure only stated that Security was to be notified that the Containment Purge Valves are about to be opened.

In addition, the investigation determined that a contributing cause was miscommunication between Control Room personnel and Security personnel. Based on the information reported to Security by Control Room personnel, Security personnel believed that they would receive a second notice before the purge valves were actually opened. Consequently, Security continued with special patrol tours of the purge valve areas, and did not provide additional compensatory measures for the open valves. This tour subsequently identified the breach.



II. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

As immediate corrective action, PVNGS Security personnel posted both of the Containment Purge Valves (CPA UV-2A and UV-3B) on the Auxiliary Building side, ensuring that no undetected access or egress occurred. In addition, Containment Purge Valve outboard supply and exhaust ducts (CPA UV-2A and UV-3B) were visually verified to be unoccupied and the personnel in the Containment Building were verified to have proper access into the area. Personnel in the Containment Building were required to exit the area utilizing normal access and egress control procedures. No unauthorized individuals were discovered in the Containment Building.

A Night Order was initiated by the Unit 1 Shift Supervisor and distributed to all three units. It stated that Control Room personnel would ensure that Security had established proper compensatory measures prior to opening the purge valves.

As corrective action, the procedures utilized by Units 1, 2, and 3 for opening the Containment Purge Valves have been revised to expand on the intent of the procedural requirement to notify Security and to include more specific instructions for ensuring that proper compensatory measures have been established by Security prior to opening the purge valves.

An additional group of administrative controls relating to the opening of vital area barriers that were previously identified and revised in 1989 have been reviewed and where applicable, revised to include explicit instructions conveying the intent of the requirement to contact Security prior to opening the specified vital area barriers.

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

Appropriate training will be developed to provide additional guidance to Security Officers on proper communication practices when vital area barrier concerns are addressed. This training is scheduled to be completed by April 30, 1990.

IV. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved on December 6, 1990 at approximately 1610 MST when a Security Officer was posted at the second containment purge valve (CPA UV-28).





ATTACHMENT 2

Response to Concerns of NRC Letter Dated February 5, 1990

- I. The referenced letter noted concerns dealing with guard demeanor and communication between Security supervisors. The inspector's review of the circumstances related to a recent allegation of aberrant behavior and abusiveness of one Security Officer to another did not indicate aberrant behavior. However, the inspector noted, the degree of horseplay and apparent tolerance of same by Security supervisors and the apparent lack of prompt communication between Security shift supervisors of various levels warrants management attention.

RESPONSE

As reported to the NRC by a letter dated December 19, 1989, site Security management does not tolerate horseplay by Security personnel. The events referenced in the inspection report were reported by Security supervision to the Security Operations Supervisor the same day they occurred and an internal review of the facts was initiated the following day. The review resulted in oral reprimands to the Security personnel involved. In addition, Security personnel have been informed that Security management does not tolerate horseplay by Security personnel and that Security personnel involved in horseplay would be subject to disciplinary action that may include termination.



- II. The referenced letter also noted concerns dealing with the apparent lack of sensitivity for Security issues as described in paragraph 4 of the inspection report. The inspector identified a specific concern related to the number and age of uncompleted maintenance requests for security-related equipment.

RESPONSE

APS has evaluated recommendations to reduce the backlog of uncompleted security maintenance work requests with a goal of improving the effectiveness and the timeliness in completing such requests. As an initial step in this effort, the Security Department reviewed the current backlog of uncompleted security maintenance work requests and developed a prioritized list. Those requests that require compensatory posting received the highest priority. A security maintenance team is being formed to address and coordinate the timely completion of these work requests. This team will be composed of varying representatives of the appropriate support organizations. The team's mission is to provide continuous coordination and oversight to maintain security maintenance equipment and systems in a high state of awareness. Security management will keep the NRC Security inspector informed of our progress in this area. In addition, Security Officers have been attending unit staff meetings to enhance Operations' awareness of current security issues.

