

APPENDIX A

NOTICE OF VIOLATION

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

Docket Nos. 50-528, 50-529 and 50-530  
License Nos. NPF-41, NPF-51 and NPF-74  
EA No. 90-56

During an NRC inspection conducted on January 31, 1990 through February 9, 1990, and February 28, 1990 through March 9, 1990, four violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), as modified by 53 Fed. Reg. 40019 (October 13, 1988), the violations are listed below:

- A. Technical Specifications, Section 6.12.2, provides in part that doors to areas where the dose rate is greater than 1000 mrem/hour shall remain locked except during periods of access control by personnel under an approved REP.

Contrary to the above,

- (1). On November 6, 1989, a Unit 3 locked high radiation area (LHRA) gate (#A-B07), that provides access to the "A" shutdown cooling heat exchanger room located on the 70' elevation of the Auxiliary Building, was open, unoccupied and unguarded. Maximum radiation levels measured in the room when the discovery was made were 2000 mrem/hr at 18" from the source of radioactive material located in the room.
- (2). On November 9, 1990, a Unit 1 LHRA gate (#R-132) that provides access to the high level storage area located on the 112' elevation of the Radwaste Building, was open, unoccupied, and unguarded. Maximum radiation levels measured in the room when the discovery was made were 2000 mrem/hr at 18"
- (3). On February 22, 1990, a Unit 3 LHRA gate (#A-B07, see Item 1 above) that provides access to the "A" shutdown cooling heat exchanger room located on the 70" elevation of the Auxiliary Building, was open, unoccupied and unguarded. Maximum radiation levels measured in the room upon discovery were 2200 mrem/hr at 18".

These are repetitive Severity Level IV Violations. (Supplement IV)

- B. Technical Specifications, Section 6.11.1 states: "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure. Licensee procedure 75RP-90P02, "Control of Locked High Radiation Areas" identifies responsibilities and actions for the control of locked high radiation areas. The procedure provides that the radiation protection shift lead technician shall be responsible



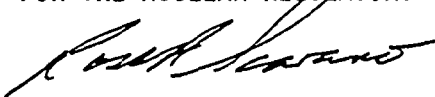
for the control of locked high radiation area (LHRA) keys and radiation protection technicians issued keys for entry to LHRA are responsible to verify that the area is properly secured upon exit and that the keys are returned and the key control log is initialed in the "secured by" block.

Contrary to the above, on February 22, 1990, the Unit 3, day shift lead radiation protection technician failed to control keys to LHRA's as required by the procedure, a Unit 3 radiation protection technician failed to return a LHRA key and initial the key control log as required by the procedure, and during the period of February 27, 1990 through March 7, 1990, ten occasions existed at Unit 2 wherein LHRA keys were returned by someone other than the individual to whom the key had been issued.

This is a Severity Level IV Violation (Supplement IV)

Pursuant to the provisions of 10 CFR 2.201, Arizona Public Service Company (Arizona Nuclear Power Project) 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 V, 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 the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION



Ross A. Scarano, Director  
Division of Radiation Safety and  
Safeguards

Dated at Walnut Creek, California  
this 6th day of April 1990

