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SUBJECT: Responds to NRC 900521 ltr re violations noted in Insp Repts 20-528/90-12,50-529/90-12 & 50-530/90-12.

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102-01738-WFC/TRB/JJN
June 20, 1990

WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

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

Reference: Letter from S. A. Richards, Chief Reactor Projects Branch, to W. F. Conway, Executive Vice President Nuclear, Arizona Public Service, dated May 21, 1990

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1, 2, and 3
Docket No. STN 50-528 (License No. NPF-41)
Docket No. STN 50-529 (License No. NPF-51)
Docket No. STN 50-530 (License No. NPF-74)
Reply to Notice of Violations 50-528/90-12-01, 50-530/90-12-01, and 50-530/90-12-02
File: 90-070-026

This letter is provided in response to the inspection conducted by Messrs, D. Coe, J. Ringwald, J. Sloan, C. Myers, and P. Qualls from March 4 through April 14, 1990. Based upon the results of the inspection, three apparent violations of NRC requirements were identified. The violations are discussed in Appendix A of the referenced letter. A restatement of the violations and PVNGS's response are provided in Appendix A and Attachment 1, respectively, to this letter.

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

Very truly yours,

WFC/TRB/JJN/tlg

Attachments

cc: J. B. Martin
D. H. Coe
T. L. Chan
A. H. Gutterman
A. C. Gehr

IE01
1/1

APPENDIX A

NOTICE OF VIOLATION

Arizona Nuclear Power Project
Palo Verde Unit 1 and 3

Docket Number 50-528 and 50-530
License Numbers NPF-41 and NPF-74

During an NRC inspection conducted on March 4 through April 14, 1990, three 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 (1989), the violations are listed below:

A. Unit 1 Technical Specifications, Section 3.3.1, requires in part that a minimum of two Excore Neutron Flux Logarithmic Power Level - High instrument will be operable in Mode 5, and allows for operation with only one channel provided certain Action Statement requirements are met.

Contrary to the above, from March 21, 1990, until March 24, 1990, all four channels of Excore Neutron Flux Logarithmic Power Level instrumentation were deenergized by licensee personnel to perform cabinet and drawer repairs while Unit 1 was in Mode 5.

This is a Severity Level IV violation applicable to Unit 1 (Supplement I).

B. 10 CFR Part 50, Appendix B, Criterion V, states in part that instructions, procedures, or drawing shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, Material Non-Compliance [sic] Report, 90-RC-0009, Conditional Request Release, did not include an appropriate quantitative acceptance criteria in that it did not specify the maximum allowable torque for use on valve 3PRC-B-V-207. The conditional release appeared to allow a maximum torque of 75 ft-lbs, whereas the proper maximum allowable was 30 ft-lbs.

This is a Severity Level IV Violation applicable to Unit 3 (Supplement I).

C. Unit 3 Technical Specifications, Section 6.8.1, states in part: ..."Written Procedures shall be established, implemented, and maintained covering the activities referenced below:

f.

This program is implemented, in part, by licensee Procedure 14AC-0FP03, "Control of Combustible/Flammable Materials and Liquids" which states in part in paragraph 3.2.10, that "combustible material shall not be stored next to outdoor safety-related water storage tanks."

Contrary to the above, on March 5, 1990, two apparently untreated wood packing crates, an apparently full 55 gallon drum with a National Fire Protection Association tag labeled 3 for flammability (extreme hazard), and a number of other 55 gallon drums similarly marked were stacked immediately adjacent to the Unit 3 Condensate Storage Tank (a safety-related tank required for safe shutdown).

This is a Severity Level IV Violation applicable to Unit 3 (Supplement I).

ATTACHMENT 1

Reply to Notice of Violation 50-528/90-12-01

I. REASON FOR THE VIOLATION

The event was a result of a misinterpretation of the Technical Specifications. Unit 1 Management reviewed Technical Specifications 3.3.1, 3.3.1 ACTION 4 (which describes the action to be taken with only one channel operable but does not address having no operable channels), and 3.0.3 (which describes actions to be taken if a limiting condition of operation is not met). Based on the fact that Technical Specification 3.0.3 is not applicable in Mode 5, and that the action statement for the condition with only one operable channel was being met, unit management concluded that removal from service of all the log channels would be consistent with the intent of the Technical Specifications. However, unit management did not recognize that it would not be acceptable to voluntarily enter into a condition that is not defined by the Technical Specifications.

II. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The wiring in the PPS cabinets and the cabinet drawers were reworked in accordance with approved work authorization documents.

On March 23, 1990, the Plant Review Board (PRB) reviewed the event, the Updated Final Safety Analysis Report (sections 7.1, 7.2, and 15.4.6), Combustion Engineering Standard Safety Analysis Report (sections 7.1, 7.2, 15.4.6), and NUREG 0852, 0800, and 0857. The PRB determined that there was no safety significance in having all log power channels inoperable based largely on the plant conditions and the operabilty of the startup channels and the Boron Dilution Alarm System. There was no impact on the health and safety of the public.

Log channel D was declared operable at approximately 0938 MST on March 26, 1990. This placed the unit within the Technical Specifications 3.3.1 Action 4, a condition defined by Technical Specifications. On March 26, 1990 at approximately 1554 MST, log channel A was declared operable. This placed the unit in compliance with Technical Specification LCO 3.3.1. Log channel B was declared operable at approximately 1955 MST on March 26, 1990. At approximately 2132 MST on March 26, 1990, Log channel C was declared operable.

A plant guideline applicable to Units 1, 2, and 3 has been promulgated defining APS's position on voluntarily entering a condition not defined by the Technical Specifications. The plant guideline clearly communicates APS's position that it is not acceptable to voluntarily enter a condition not defined by the Technical Specifications. If such a condition is experienced because of equipment failure, immediate

action must be taken to return to a condition defined by the Technical Specifications.

III. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID VIOLATIONS

APS believes the actions taken as described above are adequate to prevent recurrence.

IV. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved on March 26, 1990, when the Log channel D was declared operable.

Reply to Notice of Violation 50-530/90-12-01

I. REASON FOR THE VIOLATION

Material Nonconformance Report (MNCR) 90-RC-0009 was initiated to document the packing leakage on the Reactor Coolant System (RCS) Pressurizer instrument root valve 3PRCBV207. The nut and eyebolt on the packing gland follower were galled which limited the ability to adjust the valve packing to reduce leakage. Engineering analyzed the feasibility of installing a spacer around the existing eyebolt/nut and threading an oversized nut on the remaining eyebolt threads. The analysis was performed to calculate 1) the compressive forces and potential buckling of the spacer and 2) tensile/shear forces and potential stripping of the eyebolt and the new nut which was made of a material different than the original nut. To assure that the calculation was conservative, Engineering applied a factor of 2.5 to the nominal 30 ft-lbs field specification and then analyzed for a torque of 75 ft-lbs. The calculations demonstrated that the installation of the spacer and new nut was acceptable.

An analysis of the pins which connect the eyebolts to the valve body was not performed nor required because the existing analysis of the pins was still valid. The change involved only new spacers and nuts. An increased torque was not requested for the conditional release. The

assumption was correctly made that the valve would be torqued using "good mechanical judgement" in accordance with procedure "Fastener Tightening/Preload" (30DP-9MP02) step 3.1.8 and 3.1.9. This procedure provides detailed guidance on torquing based on material, dimensions, application, etc. Therefore, no torque specification was required.

The original preparation of the work order did not include a value for the torque specification other than the use of "good mechanical judgement". Attached to the work order was a copy of the MNCR conditional release for the installation of the spacer and oversized nut. During the review process of the work order (and therefore the MNCR conditional release), the bounding analysis of 75 ft-lbs in the disposition for the MNCR conditional release was misinterpreted to mean a limiting field specification. The work order was subsequently revised to include the restriction of 75 ft-lbs. The misinterpretation of the MNCR disposition was caused by Engineering including bounding design calculations within the conditional release and not specifying that the information was for analysis only.

II. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

As a result of this event, an investigation was conducted. A description of the event and the lessons learned were distributed to the site technical support personnel. These lessons learned were reiterated

in site technical support group communication meetings. In summary, the lessons learned which were discussed with Engineering included:

1) Precisely stating the problem and scope (which should be appropriately documented),

2) Clearly stating the required "as left" condition,

3) Technically reviewing dispositions with a questioning attitude, and

4) Following up Engineering dispositions/analysis work with formal verbal communication when appropriate to ensure understanding of the issues and resolution.

III. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID VIOLATIONS

APS believes the actions taken as described above are adequate to prevent recurrence.

IV. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved on April 17, 1990, when the Work Order was revised to specify 30 ft-lbs.

Reply to Notice of Violation 50-530/90-12-02

I. REASON FOR THE VIOLATION

The fifty-five gallon drums of flammable material, temporarily located adjacent to the Unit 3 Condensate Storage Tank, contained tendon grease which was staged for pickup and disposal. The individuals responsible for conducting the surveillance test were not aware of the requirement to obtain a transient combustible/flammable permit for interim staging adjacent to the condensate storage tank.

II. CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The Director of Operations and Maintenance issued a memo to onsite supervisors and managers identifying the safety related tanks and reiterating the requirement to not store combustible/flammable material within 50 feet of the tanks.

Daily fire prevention tours of the plant have been conducted to monitor the control of combustible/flammable materials and to initiate corrective actions.

A label request form has been initiated to evaluate posting warning labels on the condensate storage tanks, the refueling water tanks, and

the reactor makeup water tanks.

III. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID VIOLATIONS

The transient combustible material program will be revised to clarify the administrative controls for storage and inspection of transient combustible materials. Engineering is conducting a review and verification of plant areas where the storage of flammable material should be controlled. Maps will be added to the procedure to identify areas where a transient combustible permit may be applicable.

Expected completion date: July 31, 1990.

IV. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved on March 5, 1990, when the combustible material was removed.