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WILLIAM F. CONWAY  
EXECUTIVE VICE PRESIDENT  
NUCLEAR

102-02008-WFC/TRB/JRB  
April 15, 1991

Mr. John B. Martin  
Regional Administrator, Region V  
U. S. Nuclear Regulatory Commission  
1450 Maria Lane, Suite 210  
Walnut Creek, CA 94596-5368

Dear Mr. Martin:

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, 3  
Docket Nos. STN 50-528 (License No. NPF 41)  
Docket Nos. STN 50-529 (License No. NPF 51)  
Docket Nos. STN 50-530 (License No. NPF 74)  
Potential Violation Identified in NRC Exit Meeting Conducted February  
22, 1991 - Inspection Report Nos. 528, 529, 530/91-05  
File: 91-019-026; 91-070-026

During the NRC Exit Meeting conducted February 22, 1991, a potential violation was identified concerning the failure of maintenance personnel to comply with the APS Conduct of Maintenance procedure. This exit meeting was at the conclusion of a routine unannounced inspection of maintenance and inservice inspection activities conducted by Inspectors C. A. Clark and D. E. Corporandy from February 5 through February 22, 1991.

APS has subsequently evaluated this NRC concern. The results of this evaluation are provided as an attachment to this letter for your consideration.

If you have any questions, please contact T. R. Bradish at (602) 393-2521.

Sincerely,



WFC/TRB/JRB/dmn

Attachment

cc: Document Control Desk  
D. H. Coe  
A. H. Gutterman  
A. C. Gehr



## ATTACHMENT

### NRG Concerns

The inspector observed work being performed in conjunction with maintenance work orders (00454762 and 00454763) to install new thinner gauge rings at the inlet flanges for the Unit 1 pressurizer relief valves PSV-200 and PSV-201. Work was observed to have proceeded to removal of the studs, nuts, and gasket from the discharge flange of the pressurizer relief valves but there was no signature on the first step of the work order instructions section showing that it was completed. This step was to verify the equipment to be worked on is the same equipment specified by the maintenance instruction. The inspector also noted that insulation had been removed from the equipment approximately fourteen days prior to the work he observed, but there was no signature showing that the work was preceded by verification that the work was being performed on the correct equipment. Both examples were characterized as a failure to comply with the APS departmental procedure 30DP-9MP01, "Conduct of Maintenance", which states that maintenance instruction steps should be done in sequence unless the work instructions specify otherwise.

### APS Evaluation

APS believes the inspector's concern was based on his observation of the original copies of work orders 00454762 and 00454763. As discussed below, and in accordance with established practice, the original copies of both work orders were left at the radiation protection desk outside of containment and working copies of the appropriate pages of 31MT-9RC11, "Pressurizer Code Safety Valve Removal and Installation", were taken into containment by maintenance personnel.

Work orders were prepared November 15, 1990, for removal of Unit 1 pressurizer relief valves (PSV-200 and PSV-201), inspection of the flanges, and reinstallation with new thinner gauge rings at the valves' inlet flanges. On January 21 and 22, 1991, a step was added to both work orders in accordance with 30DP-9WP02, "Work Order Development", as a pen and ink change to remove insulation at the pressurizer relief valves' inlet flanges. Insulation was removed from both valves by the Central Maintenance Insulators on January 22, 1991, per the signed off work order steps and work continuation sheets dated January 22, 1991. The work continuation sheets documenting the activities performed on January 22, 1991 clearly state that the equipment tags for the equipment being worked matched the work orders. This work was documented in accordance with established practices for preparative activities.

On the evening of February 4, 1991, working copies of the work order cover sheets and the applicable pages of 31MT-9RC11 were taken into containment by maintenance personnel and the original copies of the work orders and maintenance procedures were left at the radiation protection desk outside of containment. Prerequisite 5.8 of 31MT-9RC11, which requires the performer to walk down the component to ensure the component identification number matches the work order and clearance, was signed off by maintenance personnel on the working copies of the maintenance procedures prior to beginning disassembly of the valves' discharge flanges. At the end of the shift, signatures were



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transferred from the working copies of 31MT-9RC11 to the original copies. Upon reinstallation of the pressurizer relief valves, maintenance personnel realized that step 4.1 of the work orders had not been signed off and signed it off as complete on February 6, 1991.

APS does not believe a violation of departmental procedure 30DP-9MP01 occurred. Objective evidence exists that maintenance instruction steps were actually completed in sequence, as required; i.e, maintenance personnel did verify they were working on the correct equipment prior to work progressing. Although APS has concluded that a procedural violation did not occur, the NRC inspector did identify a lack of attention to detail by maintenance personnel in transferring signatures from the working copies of procedures to the original copies. The potential for problems of this nature has previously been identified by APS and is currently being addressed by tasks intended to simplify the work control process.