

NOTICE OF VIOLATION

Arizona Public Service Company  
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 on February 17 through March 30, 1991, 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 (1990), the violations are listed below:

- A. The Unit 1 Facility Operating License states, in part, in paragraph 2.C.(7)(a): "APS shall maintain in effect all provisions of the approved Fire Protection program as described in the Final Safety Analysis Report for the facility through Amendment No. 14...."

The Unit 3 Facility Operating License states, in part, in paragraph 2.F: "APS shall implement and maintain all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility, as supplemented and amended, and as approved in the SER through Supplement 11 ..."

Table 9B.3-1 of the Updated Final Safety Analysis Report states in Item E.6 that in comparison with NRC Branch Technical Position APCSB 9.5-1 provision that "Fire extinguishers should be provided in accordance with guidelines of NFPA 10 and 10A, Portable Fire Extinguishers Installation, Maintenance and Use," the licensee "complies by providing portable extinguishers using the guidelines of NFPA 10 (1975)."

NFPA 10 (1975) states in Section 4-3.1 that, "Extinguishers shall be inspected monthly, or at more frequent intervals when circumstances require," and in Section 4-4.1 that, "Extinguishers shall be subjected to maintenance not more that one year apart or when specifically indicated by an inspection."

1. Contrary to the above, on March 5, 1991, a portable fire extinguisher was issued to a required continuous fire watch in the Unit 1 "B" ESF switchgear room, which had not been inspected since June 1990.
2. Contrary to the above, on March 6, 1991, a portable fire extinguisher was issued to a required continuous firewatch in the Unit 3 "B" ESF switchgear room, which had not been subjected to annual maintenance since November 1989.

This is a Severity Level IV violation (Supplement I) applicable to Units 1 and 3.

- B. 10 CFR 50, Appendix B, Criterion V, states in part that, "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."



Procedure 81DP-OCC09, "Drawings," Revision 0, controls changes to quality related drawings and in Appendix B, Figure 1-1, states that "Non-key" design drawings are required to be revised to "incorporate Drawing Change Notices (DCNs) within 180 days after completing Design Change Packages (DCPs) in at least one unit, or after 5 'paper change' DCNs, whichever is sooner," and "Non-key" as-built drawings are required to be revised "within 60 days after completing DCP in affected unit or after 5 'paper change' DCNs, whichever is sooner."

1. Contrary to the above, as of March 6, 1991, drawing 01-J-ZZI-004, a non-key as-built drawing, had 41 DCNs not incorporated for which the DCPs were completed, 21 of these DCNs were for DCPs completed over 60 days previously.
2. Contrary to the above, as of March 6, 1991, drawing 03-J-ZZI-004, a non-key as-built drawing, had 8 DCNs not incorporated for which the DCPs were completed, two of these DCNs were for DCPs completed over 60 days previously.
3. Contrary to the above, as of March 6, 1991, drawing 13-J-ZZI-004, a non-key design drawing, had 42 DCNs not incorporated for which the DCPs were completed, six of these DCNs were for DCPs completed over 180 days previously.

This is a Severity Level IV violation (Supplement I) applicable to Units 1, 2, and 3.

C. Unit 3 Technical Specifications 6.2.2.1 requires that:

- "a. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., Senior Reactor Operators, Reactor Operators, radiation protection technicians, auxiliary operators, and key maintenance personnel.
- "b. Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modifications, on a temporary basis, the following guidelines shall be followed (this excludes the STA working hours):
  - 1) An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
  - 2) An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.

- 3) A break of at least 8 hours should be allowed between work periods, including shift turnover time.
- 4) Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

c. Any deviation from the above guidelines... Routine deviation from the above guidelines is not authorized."

Contrary to the above, from March 11, 1991 to April 3, 1991, Unit 3 Radiation Protection technicians in responsible positions who were available to perform safety-related functions and respond to emergency situations were assigned and worked in excess of 72 hours in a 7-day period, excluding shift turnover time, on a routine basis for the accomplishment of general and routine outage-related radiation protection activities.

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

Pursuant to the provisions of 10 CFR Part 2.201, Arizona Public Service Company is hereby required to submit 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 of Violation (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.

Dated at Walnut Creek, California  
this 2<sup>nd</sup> day of MAY 1991