

NOTICE OF VIOLATION

Arizona Public Service Co.
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

During an NRC inspection conducted during the weeks of April 27 through May 1, 1992, and June 1 through 5, 1992, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion XVI, Corrective Action, states that "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and non-conformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition. The identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management."

Contrary to the above:

1. From March 1986 to May 1992, the licensee failed to correct an identified significant condition adverse to quality, in that pressurizer pressure narrow range transmitters (PT-101) were found out of tolerance 37 times in 60 calibrations, and the licensee had neither documented the extent of this adverse trend nor taken action to identify the root cause, or take corrective action.
2. From January 1987 to May 1992, the licensee failed to correct an identified significant condition adverse to quality, in that low lube oil pressure switches for the six emergency diesel generators were found out of tolerance 52 times in 67 calibrations, and the licensee had neither documented the extent of this adverse trend nor taken action to identify the root cause, or take corrective action.

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

- B. Palo Verde Units 1, 2, and 3 Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February, 1978.

Regulatory Guide 1.33, Appendix A, recommends procedures for performing maintenance and states that "Maintenance that can affect the performance of safety-related equipment should be properly pre-planned and performed in accordance with procedures, documented instructions, or drawings appropriate to the circumstances." It further recommends procedures for

control of measuring and test equipment and for surveillance tests, procedures, and calibrations.

Surveillance Procedure 36ST-9SB21, "PPS Input Loop Calibration for Parameter 6, LO PZR PRESS," Step 4.1.1, requires the use of a pressure gauge capable of measuring 0 - 3020 pounds per square inch (psi) when performing the surveillance, and step 8.2.3 states, in part, "install the 0 - 4000 PSIG gauge..."

Contrary to the above, on March 8, 1992, during performance of Palo Verde Unit 1 Work Order 00517901 for low pressurizer pressure transmitter surveillance test calibration, the licensee used a 0 - 3000 psi gauge to calibrate the instrument instead of the required 0 - 4000 psi gauge.

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

Pursuant to the provisions of 10 CFR 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, D.C. 20555 with a copy to the Regional Administrator, Region V, and a copy to the NRC Resident Inspector 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, or, if contested, the basis for contesting the violation, (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, the Commission may issue an order or a demand for information as to why the license should not be modified, suspended, or revoked or why such other actions, as may be proper, should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Walnut Creek, California
this 6th day of July, 1992