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WILLIAM F. CONWAY
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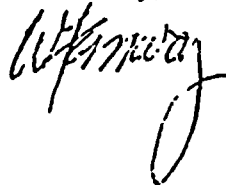
Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Reply to Notice of Violations 50-528,529,530/92-14-02 & 50-528/92-14-03
Reply to Notice of Deviation 50-528,529,530/92-14-01
File: 92-056-026

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528,529, 530/92-14 and the Notice of Violations and Deviation, dated July 6, 1992. Pursuant to the provisions of 10 CFR 2.201, APS' responses are enclosed. Per telephone conversation on August 4, 1992, between B. J. Olson, NRC, and T. R. Bradish, APS, the due date for this response was extended from August 5, 1992, to August 7, 1992. Appendix A to this letter is a restatement of the Notice of Violations and Appendix B is a restatement of the Notice of Deviation. APS' responses are provided in Enclosures 1 and 2. Enclosure 3 provides an assessment, as requested in the letter that transmitted the Inspection Report, of the concern about the adequacy of corrective actions for instruments found out of tolerance. An assessment of compliance with procedural requirements for M&TE usage is in progress. APS will forward the results of the second assessment to the NRC by August 31, 1992.

If you should have any questions, please contact Thomas R. Bradish (602) 393-5421.

Sincerely,



WFC/DK/pmm
Enclosures:

- Appendix A - Restatement of Notice of Violations
- Enclosure 1 - Reply to Notice of Violations
- Appendix B - Restatement of Notice of Deviation
- Enclosure 2 - Reply to Notice of Deviation
- Enclosure 3 - Assessment of the Adequacy of Corrective Actions

cc: J. B. Martin
J. A. Sloan

~~92-056-026-1799~~

APPENDIX A

**RESTATEMENT OF NOTICE OF VIOLATIONS 50-528,529,530/92-14-02 AND
50-528/92-14-03
NRC INSPECTION CONDUCTED APRIL 27 - JUNE 5, 1992
INSPECTION REPORT NOS. 50-528,529, AND 530/92-14**



**RESTATEMENT OF NOTICE OF VIOLATIONS 50-528,529,530/92-14-02 AND
50-528/92-14-03**

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. Violation 50-528,529,530/92-14-02 Corrective Action

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 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. Violation 50-528/92-14-03 Procedural Compliance

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 circumstance." 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.



ENCLOSURE 1

REPLY TO NOTICE OF VIOLATIONS 50-528,529,530/92-14-02 & 50-528/92-14-03

NRC INSPECTION CONDUCTED APRIL 27 - JUNE 5, 1992

INSPECTION REPORT NOS. 50-528,529 AND 530/92-14



REPLY TO NOTICE OF VIOLATION (A) 50-528,529,530/92-14-02

Reason for the Violation

The reason for the violation has been determined to be that the procedures used by APS to periodically calibrate plant instrumentation do not clearly define the criteria for a significant out of tolerance condition which would require further evaluation.

Additionally, the high number of out of tolerance conditions is a direct result of as-found acceptance criteria being unduly restrictive. The calibration procedures specify as-found acceptance criteria that is identical to the as-left (or optimally calibrated) value. Allowances are not made to account for normal instrument shift, system conditions, or environmental effects.

Corrective Actions Taken and Results Achieved

Both examples cited in the NOV have been evaluated under the Condition Report Disposition Request (CRDR) program. No safety significant conditions were identified by the evaluation, and the devices were determined to be capable of performing their intended functions.



Corrective Actions That Will Be Taken to Avoid Further Violations

The corrective actions that will be taken to ensure failed instrument loop components are properly identified, evaluated, and dispositioned are as follows:

- 1) Screening criteria and threshold limits will be developed for use by the work group supervisors to identify which instrument loop components that exceed the currently specified as-found test acceptance criteria require further evaluation by the Engineering Department. This action will be completed by August 31, 1992.
- 2) Preventive Maintenance and Surveillance Testing procedures (30AC-9MP02 and 73AC-9ZZ04) will be revised to require the initiation of a CRDR when instruments exceed their threshold limits. This will provide Engineering with the information needed to trend and evaluate long term performance of critical plant components. These revisions will be completed by November 30, 1992. Until these procedures are formally changed, guidance will be given to the work group supervisors on the requirement to initiate a CRDR as part of action 1 above.
- 3) As the PVNGS Setpoint Program progresses to reconstitute the design basis of instrument setpoints and establish total loop uncertainties, appropriate as-found acceptance criteria for critical loop components will be established. The newly established acceptance criteria will include factors such as normal instrument drift, system conditions, and environmental effects. Surveillance and calibration procedures will be updated to include the revised as-found acceptance criteria. The procedures will be



changed, using the instruction change request process, as the revised as-found acceptance criteria become available.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by November 30, 1992, when corrective actions 1 and 2 above are complete.



REPLY TO NOTICE OF VIOLATION (B) 50-528/92-14-03

Reason For The Violation

The reason for the violation was a cognitive personal error in that an I&C Technician believed it was acceptable to substitute a 0-3000 psi gauge for a 0-4000 psi gauge during the performance of surveillance test 36ST-9SB21 "PPS Input Loop Calibration for Parameter 6, LO PZR PRESS," under work order 00517901 without changing the procedure requirement.

Corrective Actions Taken and Results Achieved

Surveillance test 36ST-9SB21 (work order 00517901) was reviewed on June 3, 1992. The channel being calibrated required a maximum input value of 2995 psi. As a result, compliance with Technical Specification had been maintained. On July 29, 1992, a meeting was conducted by the Unit 1 I&C Maintenance Supervisor to reinforce management's expectations on procedural compliance with the Unit 1 I&C Technicians. The individual I&C Technician who checked out the 0-3000 psi gauge for use in performance of the surveillance test is no longer employed by APS.

Corrective Action That Will Be Taken To Avoid Further Violations

An assessment has been initiated to address whether I&C Technicians are properly trained and qualified to determine appropriate M&TE in lieu of procedurally specifying M&TE. This assessment, being conducted under CRDR 920356, will identify the necessary corrective



actions that will be taken by APS to avoid further violations. The results of CRDR 920356, including planned corrective actions, will be forwarded to the NRC by August 31, 1992.

Date When Full Compliance Will Be Achieved

Full compliance was confirmed based on a subsequent review of surveillance test 36ST-9SB21 (work order 00517901), conducted on June 3, 1992, which determined that the range and accuracy of the 0-3000 psi gauge was adequate for the specific application.



APPENDIX B

RESTATEMENT OF NOTICE OF DEVIATION 50-528,529,530/92-14-01

NRC INSPECTION CONDUCTED APRIL 27 - JUNE 5, 1992

INSPECTION REPORT NOS. 50-528,529, AND 530/92-14



RESTATEMENT OF NOTICE OF DEVIATION 50-528,529,530/92-14-01

During an NRC inspection conducted during the weeks of April 27 through May 1, 1992, and June 1 through 5, 1992, a deviation from your Updated Final Safety Analysis Report (UFSAR) commitments was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C, the deviation is listed below:

- A. The licensee's UFSAR states in part A of Section 9.5.6.1 that, "The DGSS (diesel generator starting system) shall provide a stored compressed air supply sufficient for accomplishing diesel generator cranking cycle five times without starting the diesel generator air compressors."

The licensee's UFSAR states in part A of paragraph 9.5.6.4 that, "Sufficient storage capacity is provided in each compressed air tank to provide for five starting cycles of a diesel generator without starting an air compressor."

Contrary to the above, as of January 28, 1986, the licensee routinely operated the DGSS at pressures lower than the 250 pounds per square inch gauge at which design testing had indicated that an adequate air supply existed for ensuring the capability of five starting cycles without starting the air compressors.

ENCLOSURE 2

REPLY TO NOTICE OF DEVIATION 50-528,529,530/92-14-01

NRC INSPECTION CONDUCTED APRIL 27 - JUNE 5, 1992

INSPECTION REPORT NOS. 50-528,529 AND 530/92-14



REPLY TO NOTICE OF DEVIATION 50-528,529,530/92-14-01

Reason For The Deviation

This Deviation was the result of APS' interpretation of the Standard Review Plan (NUREG-0800), Section 9.5.6.II.4.g, to be a design guideline for sizing the Diesel Generator Starting System (DGSS) air receivers. The PVNGS Final Safety Analysis Report was based on this interpretation. Start-up preoperational testing was developed to verify the DGSS air receivers were capable of providing air for five diesel generator starts with the air compressors inoperable. Because this was believed to be a sizing criteria, not an operational criteria, the verification test was initiated with a fully charged DGSS air receiver (250 psig).

Normal system operation is with both receivers on line providing enough air to start the diesel generator approximately ten times. Single air receiver operation is allowed procedurally and is based on the operational criteria to start and load the diesel generator in ten seconds. APS meets this operational criteria by maintaining air pressure above 175 psig.

Corrective Actions Taken and Results Achieved

APS has evaluated the DGSS design and has concluded that no safety concern exists with the current as-built configuration for the following reasons:

- 1) The UFSAR identifies that the "incomplete start sequence" trip is in effect in the test mode of operation but is not in effect in the emergency mode of operation. The bypassing of

this trip during an emergency start removes any operational significance from the five start criteria.

- 2) There are no descriptions in the UFSAR Accident Analyses that require multiple diesel engine starts or start attempts.
- 3) There are no Technical Specification requirements for multiple diesel engine starts or start attempts.
- 4) In the unlikely event that both diesel generator trains fail to start in response to an emergency signal, the Station Blackout Analysis verifies that the plant can cope for the required one-hour period until the alternate ac power supplies are available.

Corrective Actions That Will Be Taken To Avoid Further Deviations

A UFSAR change will be processed to clarify how the five start criteria was applied to PVNGS. A 10 CFR 50.59 review and evaluation will be conducted in concert with the UFSAR change to ensure no unreviewed safety questions exist. A Licensing Document Change Request (LDCR) will be initiated by August 31, 1992.

Date When Full Compliance Will Be Achieved.

Full compliance will be achieved by January 31, 1993, when the LDCR is approved to reflect the clarification of the five start criteria.



ENCLOSURE 3

ASSESSMENT OF THE ADEQUACY OF CORRECTIVE ACTIONS

NRC INSPECTION CONDUCTED APRIL 27 - JUNE 5, 1992

INSPECTION REPORT NOS. 50-528,529, AND 530/92-14



ASSESSMENT OF THE ADEQUACY OF CORRECTIVE ACTIONS

A detailed review of the calibration records cited in the NOV revealed that each specific instance of equipment failing to achieve applicable as-found acceptance criteria was reviewed by cognizant personnel (including the unit shift supervisor as appropriate), and the appropriate immediate corrective actions were initiated. Given the nature of the as-found acceptance criteria, these corrective actions generally consisted of recalibration of the device under evaluation. In example 1, when the test results did indicate a significant out of tolerance condition, corrective action was taken in that the transmitter was replaced. Whereas in example 2, APS maintains that the test results did not indicate a significant condition adverse to quality. This maintenance history demonstrates that the Plant Operations, Maintenance, and Engineering staff were effective in monitoring safety system performance, and that prompt corrective actions were implemented in response to potential failures.

Based on this review, APS is confident that adverse conditions, which could result from ineffective corrective action on instrumentation found out of tolerance, are not prevalent at PVNGS. However, as discussed in the response to the violation (Enclosure 1) the new screening, notification, and trending processes being developed will ensure significant out of tolerance conditions are more readily recognized, evaluated, and appropriate corrective action taken.



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SUBJECT: Responds to NRC 920706 ltr re violations noted in insp repts
50-528/92-14,50-529/92-14 & 50-530/92-14 on 920427 through
920501.Corrective actions:both examples cited on NOV has
been evaluated under Condition Rept Disposition Request.

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102-02230-WFC/DK
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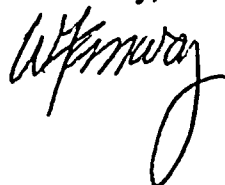
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If you should have any questions, please contact Thomas R. Bradish (602) 393-5421.

Sincerely,



WFC/DK/pmm
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- Appendix A - Restatement of Notice of Violations
- Enclosure 1 - Reply to Notice of Violations
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- Enclosure 3 - Assessment of the Adequacy of Corrective Actions

cc: J. B. Martin
J. A. Sloan

9208120094 920807
PDR ADDCK 05000528
G PDR

JED

APPENDIX A

**RESTATEMENT OF NOTICE OF VIOLATIONS 50-528,529,530/92-14-02 AND
50-528/92-14-03
NRC INSPECTION CONDUCTED APRIL 27 - JUNE 5, 1992
INSPECTION REPORT NOS. 50-528,529, AND 530/92-14**



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A. Violation 50-528,529,530/92-14-02 Corrective Action

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 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. Violation 50-528/92-14-03 Procedural Compliance

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 circumstance." 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.

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ENCLOSURE 1

REPLY TO NOTICE OF VIOLATIONS 50-528,529,530/92-14-02 & 50-528/92-14-03

NRC INSPECTION CONDUCTED APRIL 27 - JUNE 5, 1992

INSPECTION REPORT NOS. 50-528,529 AND 530/92-14

REPLY TO NOTICE OF VIOLATION (A) 50-528,529,530/92-14-02

Reason for the Violation

The reason for the violation has been determined to be that the procedures used by APS to periodically calibrate plant instrumentation do not clearly define the criteria for a significant out of tolerance condition which would require further evaluation.

Additionally, the high number of out of tolerance conditions is a direct result of as-found acceptance criteria being unduly restrictive. The calibration procedures specify as-found acceptance criteria that is identical to the as-left (or optimally calibrated) value. Allowances are not made to account for normal instrument shift, system conditions, or environmental effects.

Corrective Actions Taken and Results Achieved

Both examples cited in the NOV have been evaluated under the Condition Report Disposition Request (CRDR) program. No safety significant conditions were identified by the evaluation, and the devices were determined to be capable of performing their intended functions.



Corrective Actions That Will Be Taken to Avoid Further Violations

The corrective actions that will be taken to ensure failed instrument loop components are properly identified, evaluated, and dispositioned are as follows:

- 1) Screening criteria and threshold limits will be developed for use by the work group supervisors to identify which instrument loop components that exceed the currently specified as-found test acceptance criteria require further evaluation by the Engineering Department. This action will be completed by August 31, 1992.
- 2) Preventive Maintenance and Surveillance Testing procedures (30AC-9MP02 and 73AC-9ZZ04) will be revised to require the initiation of a CRDR when instruments exceed their threshold limits. This will provide Engineering with the information needed to trend and evaluate long term performance of critical plant components. These revisions will be completed by November 30, 1992. Until these procedures are formally changed, guidance will be given to the work group supervisors on the requirement to initiate a CRDR as part of action 1 above.
- 3) As the PVNGS Setpoint Program progresses to reconstitute the design basis of instrument setpoints and establish total loop uncertainties, appropriate as-found acceptance criteria for critical loop components will be established. The newly established acceptance criteria will include factors such as normal instrument drift, system conditions, and environmental effects. Surveillance and calibration procedures will be updated to include the revised as-found acceptance criteria. The procedures will be

changed, using the instruction change request process, as the revised as-found acceptance criteria become available.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by November 30, 1992, when corrective actions 1 and 2 above are complete.



REPLY TO NOTICE OF VIOLATION (B) 50-528/92-14-03

Reason For The Violation

The reason for the violation was a cognitive personal error in that an I&C Technician believed it was acceptable to substitute a 0-3000 psi gauge for a 0-4000 psi gauge during the performance of surveillance test 36ST-9SB21 "PPS Input Loop Calibration for Parameter 6, LO PZR PRESS," under work order 00517901 without changing the procedure requirement.

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Surveillance test 36ST-9SB21 (work order 00517901) was reviewed on June 3, 1992. The channel being calibrated required a maximum input value of 2995 psi. As a result, compliance with Technical Specification had been maintained. On July 29, 1992, a meeting was conducted by the Unit 1 I&C Maintenance Supervisor to reinforce management's expectations on procedural compliance with the Unit 1 I&C Technicians. The individual I&C Technician who checked out the 0-3000 psi gauge for use in performance of the surveillance test is no longer employed by APS.

Corrective Action That Will Be Taken To Avoid Further Violations

An assessment has been initiated to address whether I&C Technicians are properly trained and qualified to determine appropriate M&TE in lieu of procedurally specifying M&TE. This assessment, being conducted under CRDR 920356, will identify the necessary corrective



actions that will be taken by APS to avoid further violations. The results of CRDR 920356, including planned corrective actions, will be forwarded to the NRC by August 31, 1992.

Date When Full Compliance Will Be Achieved

Full compliance was confirmed based on a subsequent review of surveillance test 36ST-9SB21 (work order 00517901), conducted on June 3, 1992, which determined that the range and accuracy of the 0-3000 psi gauge was adequate for the specific application.



APPENDIX B

RESTATEMENT OF NOTICE OF DEVIATION 50-528,529,530/92-14-01

NRC INSPECTION CONDUCTED APRIL 27 - JUNE 5, 1992

INSPECTION REPORT NOS. 50-528,529, AND 530/92-14

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The licensee's UFSAR states in part A of paragraph 9.5.6.4 that, "Sufficient storage capacity is provided in each compressed air tank to provide for five starting cycles of a diesel generator without starting an air compressor."

Contrary to the above, as of January 28, 1986, the licensee routinely operated the DGSS at pressures lower than the 250 pounds per square inch gauge at which design testing had indicated that an adequate air supply existed for ensuring the capability of five starting cycles without starting the air compressors.



ENCLOSURE 2

REPLY TO NOTICE OF DEVIATION 50-528,529,530/92-14-01

NRC INSPECTION CONDUCTED APRIL 27 - JUNE 5, 1992

INSPECTION REPORT NOS. 50-528,529 AND 530/92-14



REPLY TO NOTICE OF DEVIATION 50-528,529,530/92-14-01

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This Deviation was the result of APS' interpretation of the Standard Review Plan (NUREG-0800), Section 9.5.6.II.4.g, to be a design guideline for sizing the Diesel Generator Starting System (DGSS) air receivers. The PVNGS Final Safety Analysis Report was based on this interpretation. Start-up preoperational testing was developed to verify the DGSS air receivers were capable of providing air for five diesel generator starts with the air compressors inoperable. Because this was believed to be a sizing criteria, not an operational criteria, the verification test was initiated with a fully charged DGSS air receiver (250 psig).

Normal system operation is with both receivers on line providing enough air to start the diesel generator approximately ten times. Single air receiver operation is allowed procedurally and is based on the operational criteria to start and load the diesel generator in ten seconds. APS meets this operational criteria by maintaining air pressure above 175 psig.

Corrective Actions Taken and Results Achieved

APS has evaluated the DGSS design and has concluded that no safety concern exists with the current as-built configuration for the following reasons:

- 1) The UFSAR identifies that the "incomplete start sequence" trip is in effect in the test mode of operation but is not in effect in the emergency mode of operation. The bypassing of

this trip during an emergency start removes any operational significance from the five start criteria.

- 2) There are no descriptions in the UFSAR Accident Analyses that require multiple diesel engine starts or start attempts.
- 3) There are no Technical Specification requirements for multiple diesel engine starts or start attempts.
- 4) In the unlikely event that both diesel generator trains fail to start in response to an emergency signal, the Station Blackout Analysis verifies that the plant can cope for the required one-hour period until the alternate ac power supplies are available.

Corrective Actions That Will Be Taken To Avoid Further Deviations

A UFSAR change will be processed to clarify how the five start criteria was applied to PVNGS. A 10 CFR 50.59 review and evaluation will be conducted in concert with the UFSAR change to ensure no unreviewed safety questions exist. A Licensing Document Change Request (LDCR) will be initiated by August 31, 1992.

Date When Full Compliance Will Be Achieved.

Full compliance will be achieved by January 31, 1993, when the LDCR is approved to reflect the clarification of the five start criteria.



ENCLOSURE 3

ASSESSMENT OF THE ADEQUACY OF CORRECTIVE ACTIONS

NRC INSPECTION CONDUCTED APRIL 27 - JUNE 5, 1992

INSPECTION REPORT NOS. 50-528,529, AND 530/92-14



ASSESSMENT OF THE ADEQUACY OF CORRECTIVE ACTIONS

A detailed review of the calibration records cited in the NOV revealed that each specific instance of equipment failing to achieve applicable as-found acceptance criteria was reviewed by cognizant personnel (including the unit shift supervisor as appropriate), and the appropriate immediate corrective actions were initiated. Given the nature of the as-found acceptance criteria, these corrective actions generally consisted of recalibration of the device under evaluation. In example 1, when the test results did indicate a significant out of tolerance condition, corrective action was taken in that the transmitter was replaced. Whereas in example 2, APS maintains that the test results did not indicate a significant condition adverse to quality. This maintenance history demonstrates that the Plant Operations, Maintenance, and Engineering staff were effective in monitoring safety system performance, and that prompt corrective actions were implemented in response to potential failures.

Based on this review, APS is confident that adverse conditions, which could result from ineffective corrective action on instrumentation found out of tolerance, are not prevalent at PVNGS. However, as discussed in the response to the violation (Enclosure 1) the new screening, notification, and trending processes being developed will ensure significant out of tolerance conditions are more readily recognized, evaluated, and appropriate corrective action taken.

