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SUBJECT: Provides results of assessment including planned corrective
actions as committed to 920807 ltr.

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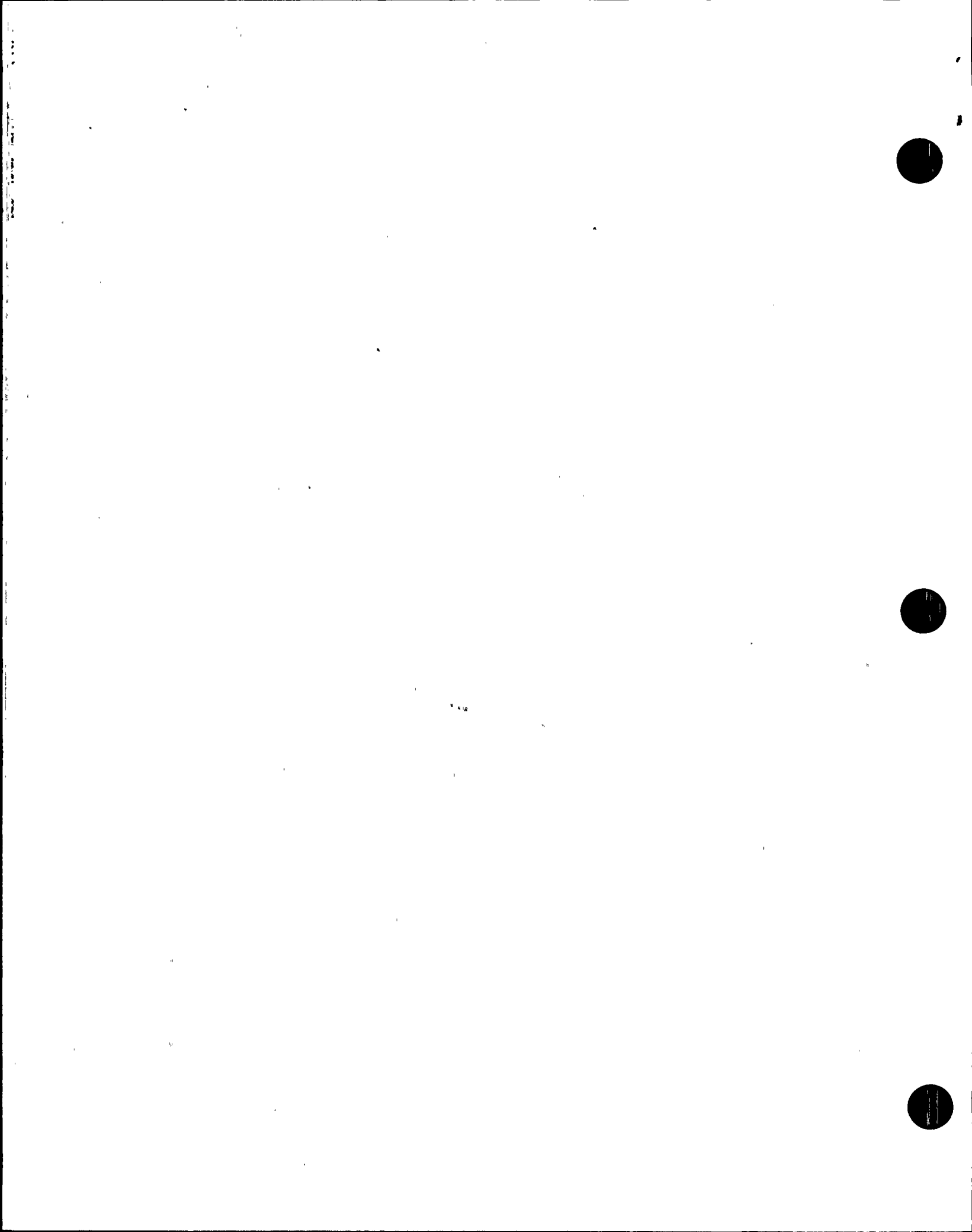
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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-02261-WFC/TRB/DLK
August 31, 1992

U. S. Nuclear Regulatory Commission
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- References: 1) NRC Inspection Report 50-528, 529, and 530/92-14, dated July 6, 1992
2) Letter 102-02230, dated August 7, 1992, from W. F. Conway, APS, to NRC, "Reply to Notice of Violation 50-528/92-14-03"

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50/528/529/530
Assessment of Compliance with Procedural Requirements
for Measuring and Test Equipment (M&TE) Usage
File: 92-056-026**

Arizona Public Service Company (APS) has completed the assessment of compliance with procedural requirements for M&TE usage, as requested in the letter that transmitted Reference 1. The enclosure to this letter provides the results of that assessment, including the planned corrective actions as committed to in Reference 2.

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

Sincerely,

James M. Levine for WFC

WFC/TRB/DLK/pmm

Enclosure: Assessment Results of Compliance with Procedural Requirements for Measuring and Test Equipment (M&TE) Usage

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

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ENCLOSURE 1

**ASSESSMENT RESULTS OF COMPLIANCE WITH PROCEDURAL
REQUIREMENTS FOR MEASURING AND TEST EQUIPMENT (M&TE) USAGE**

NRC INSPECTION CONDUCTED APRIL 27 - JUNE 5, 1992

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



ASSESSMENT RESULTS OF COMPLIANCE WITH PROCEDURAL REQUIREMENTS FOR MEASURING AND TEST EQUIPMENT (M&TE) USAGE

The surveillance procedures, used to calibrate safety-related instrumentation at PVNGS, define the range and accuracy requirements for M&TE needed to satisfactorily accomplish the procedure in the "Special Test Equipment" section. This section also frequently includes suggested M&TE that is generally readily available, meets the defined range and accuracy requirements, but is not required to satisfactorily accomplish the procedure. The majority of I&C surveillance procedures, that require the use of a pressure gauge, do not specify the M&TE in the "Instruction" section of the procedure. The test performer selects the proper M&TE using the guidance provided in the "Special Test Equipment" section, and basic craft knowledge and skills obtained through training and work experience. Basic craft knowledge and skills are not considered an alternative to following procedural requirements and should not have been used to substitute M&TE that was procedurally specified, as discussed in References 1 and 2.

Finally, a review was performed on a selected sample of completed surveillance tests (approximately 20) in which the M&TE used was different than the suggested M&TE. In all cases, the M&TE used met the procedurally defined M&TE requirements.

Based on these facts, Arizona Public Service Company is confident that M&TE used at PVNGS is of the proper range and accuracy to optimally calibrate and maintain safety-related instrumentation in compliance with Technical Specifications. Furthermore, qualified test performers at PVNGS possess the necessary skills to properly select M&TE using procedural guidance that defines the range and accuracy requirements. However, to avoid further violations similar to 528/92-14-03 the following corrective actions will be taken:

- 1) The I&C surveillance procedures, that require the use of a pressure gauge, will be reviewed to verify the required M&TE is properly identified in the "Special Test Equipment" section. In order to provide consistency, where there is no technical justification to specify M&TE in the "Instruction" section, the surveillance procedures will be revised to allow the test performer to select the appropriate M&TE based on the guidance provided in the "Special Test Equipment" section. These revisions will be completed by July 31, 1993.
- 2) The I&C Safety System Functional Inspection Report (92-14) and Condition Report/Disposition Request 920356 will be incorporated into the Training Change System for evaluation and inclusion in appropriate training by December 31, 1992.

