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AUTH. NAME AUTHOR AFFILIATION
 CONWAY, W.F. Arizona Public Service Co. (formerly Arizona Nuclear Power
 RECIPIENT NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violation noted in insp repts 50-528/94-02,
 50-529/94-02 & 50-530/94-02. Corrective actions: work
 suspended & remaining crew members briefed to emphasize
 responsibility to wear & control ACADs dosimetry.

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102-02908-WFC/AKK/PJC

April 13, 1994

WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Washington, D. C. 20555

Reference: Letter dated March 16, 1994, from C. A. VanDemburgh, Acting Deputy Director, Division of Reactor Safety and Projects, NRC, to W. F. Conway, Executive Vice President, Nuclear, APS

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 Violation 50-529/94-02-01
File: 94-070-026**

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/94-02 and the Notice of Violation dated March 16, 1994. Enclosure 1 to this letter is a restatement of the Notice of Violation. APS' response is provided in Enclosure 2.

Should you have any questions, please call Angela K. Krainik (602) 393-5421.

Sincerely,



WFC/AKK/PJC

Enclosures:

1. Restatement of Notice of Violation
2. Reply to Notice of Violation

cc: L. J. Callan
K. E. Perkins, Jr.
K. E. Johnston

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ENCLOSURE 1

RESTATEMENT OF NOTICE OF VIOLATION 50-529/94-02-01

NRC INSPECTION CONDUCTED

JANUARY 11 THROUGH FEBRUARY 14, 1994



Restatement of Notice of Violation 50-529/94-02-01

During an NRC inspection conducted on January 11 through February 14, 1994, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

- A. Unit 2 Technical Specification 6.8.1 requires, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, February 1978.

Regulatory Guide 1.33, Appendix A, requires, in part, that procedures be prepared for (1) access control to radiation areas and (2) security and visitor control.

Procedure 75AC-9RO01, revision 2, "Radiation Exposure and Access Control," Step 3.2.3, requires that personnel be issued dosimetry which shall be worn at all times within the radiological controlled area (RCA). Step 3.2.4.1 requires that dosimetry shall normally be worn on the front of the body between the thigh and head, unless directed otherwise by radiation protection (RP).

Procedure 20AC-0SK04, revision 9, "Protected/Vital Area Personnel Access Control," Step 3.2.1, requires that automatic controlled access devices (ACADs) shall be displayed by all individuals while inside protected/vital areas and shall be positioned on the front of the outermost garment, between the neck and the waist, photograph side out.

Contrary to the above, on January 25, 1994, a contract employee who had been issued dosimetry for work within the RCA and had been issued an ACAD for work inside the protected area was not wearing the dosimetry on the front of his body between the thigh and head and was not wearing the ACAD between the neck and waist. The employee had removed his ACAD and dosimetry and placed it several feet away.

This is a Severity Level IV violation (Supplements III and IV) applicable to Unit 2.



ENCLOSURE 2 .

REPLY TO NOTICE OF VIOLATION 50-529/94-02-01

NRC INSPECTION CONDUCTED

JANUARY 11 THROUGH FEBRUARY 14, 1994



REPLY TO VIOLATION A (50-529/94-02-01)

Reason For The Violation

The violation was the result of a personnel error by a contract employee working in the Steam Generator Chemical Cleaning Tank Farm area. The APS investigation found that the individual had been attempting to operate a valve associated with chemical cleaning. The lanyard to which his Automated Controlled Access Device (ACAD) and dosimetry were attached interfered with the performance of the task, so the individual removed it and placed it aside, approximately three to four feet away, in order to complete the task. This action was not in accordance with the governing administrative controls for personnel access to the protected area and the radiologically controlled area.

Corrective Steps That Have Been Taken And Results Achieved

As immediate corrective action, Radiation Protection personnel surveyed the area in which the individual was working, denied him further access to the radiologically controlled area (RCA), pulled and read his dosimetry, and performed an exposure evaluation. Based upon the survey and the exposure evaluation, APS determined that the individual could have received a maximum, unmonitored exposure of .003 millirem.



Security Department personnel suspended the individual's protected area access. A security computer transaction log was run which verified that no unauthorized use of the individual's ACAD had occurred while it was not within his immediate control.

The contract company released the worker, and he is no longer employed at the PVNGS site.

Corrective Steps That Will Be Taken To Avoid Further Violations

Work was suspended, and the remaining crew members were briefed to emphasize their responsibility to wear and control their ACADs and dosimetry at all times.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on January 25, 1994, when the individual's access was revoked, and the remaining crew members were briefed by their supervision.

