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DOCKET #
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AUTH. NAME: HOWELL, A.T.
 RECIP. NAME: LEVINE, J.M.
 AUTHOR AFFILIATION: Region 4 (Post 820201)
 RECIPIENT AFFILIATION: Arizona Public Service Co. (formerly Arizona Nuclear Power)

SUBJECT: Forwards insp repts 50-528/97-22, 50-529/97-22 & 50-530/97-22 on 970908-12 & notice of violation. Violation identified for failure to translate requirement from design change package to work order.

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION

111 RYAN PLAZA DRIVE SUITE 400
ARLINGTON TEXAS 76011-6064

October 8, 1997

James M. Levine, Senior Vice
President, Nuclear
Arizona Public Service Company
P.O. Box 53999
Phoenix, Arizona 85072-3999

SUBJECT: NRC INSPECTION REPORT 50-528/97-22; 50-529/97-22; 50-530/97-22 AND
NOTICE OF VIOLATION

Dear Mr. Levine:

A special NRC inspection was conducted September 8-12, 1997, at your Palo Verde Nuclear Generating Station, Units 1, 2, and 3, reactor facilities to review the inadvertent dilution of the Unit 2 spent fuel pool on August 12, 1997. The event occurred during the installation of a modification to provide a permanent backup air supply to the spent fuel pool transfer canal gate seal. The enclosed report presents the scope and results of that inspection.

While the overall results of the inadvertent dilution of the Unit 2 spent fuel pool had minor safety significance in this particular instance, the contributing factor of poor inter-departmental communications has the potential to lead to safety-significant events. This is third event this year, documented in NRC inspection reports (e.g., 50-528;-529;-530/97-09 and 97-15), in which poor communications have been contributors. In this event, none of the personnel supervising the activities evaluated the synergistic effects of the three activities ongoing in the spent fuel pool area. The control room operators were not aware of one of the activities, the filter replacement training in the cask loading pit, which was not on the work schedule, was not evaluated for risk, and was performed under an "activity tracking only" work order. While we understand that your work control process allows for nonsafety-related activities to be performed in this manner, your work control process implementation was weak in that a nonsafety-related task challenged the ability of the spent fuel pool to perform its safety-related functions.

A violation of NRC requirements was identified for the failure to translate a requirement from the design change package to the work order. This requirement was intended to prohibit fuel movement or handling while installing the modification. This violation is of concern because the reliance on the skill-of-the-craft of the work planner to prepare the work package and the resulting work order review and approval did not provide assurance that this requirement would be met.

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Q PDR






The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding this violation are described in detail in the enclosed report. Please note that you are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,


for Arthur T. Howell III, Director
Division of Reactor Safety

Docket Nos.: 50-528; 50-529; 50-530
License Nos.: NPF-41; NPF-51; NPF-74

Enclosures:

1. Notice of Violation
2. NRC Inspection Report
50-528/97-22; 50-529/97-22;
50-530/97-22

cc w/enclosures:

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-4-

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E-Mail report to T. Frye (TJF)
 E-Mail report to T. Hiltz (TGH)
 E-Mail report to NRR Event Tracking System (IPAS)
 E-Mail report to Document Control Desk (DOCDESK)
 E-Mail report to Richard Correia (RPC)
 E-Mail report to Frank Talbot (FXT)

bcc to DCD (IE01)

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