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	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.									A			
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NUCLEAR REGULATORY COMMISSION

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offering to Texas 1501 5064
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:

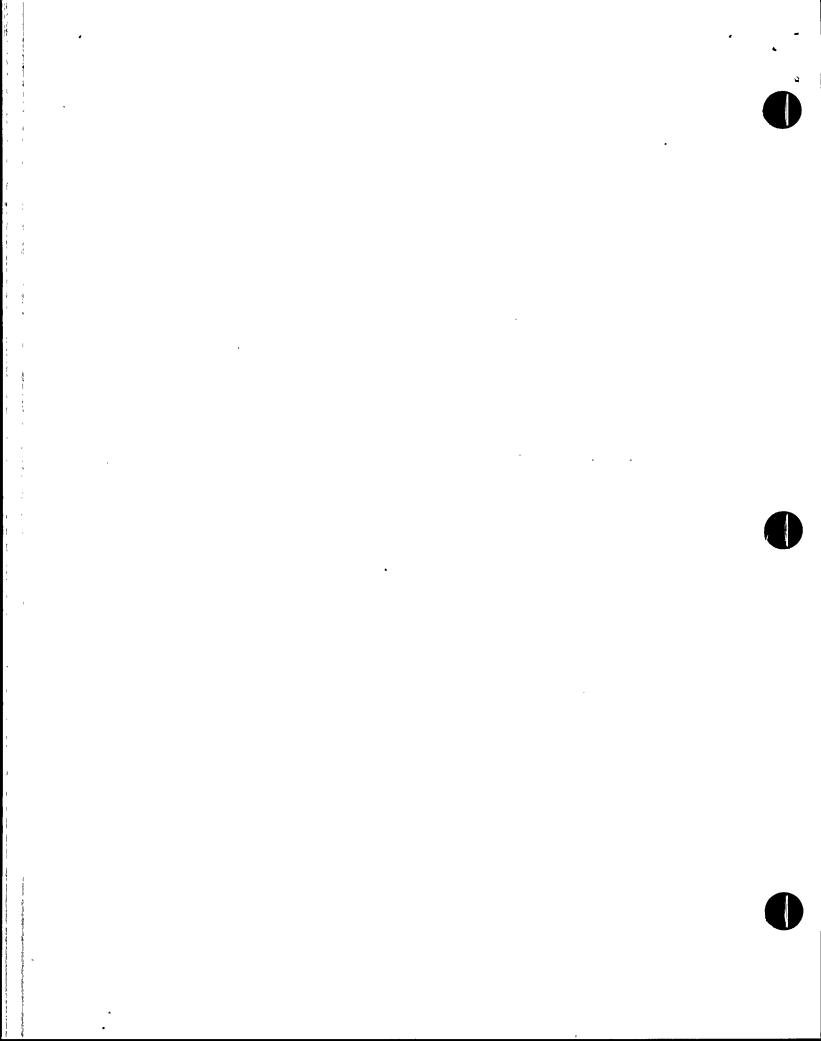
A special NRC inspection was conducted September 8-12, 1997, at your Palo Verde Nuclear Generating Station, Units 1, 2, and 3, reactor facilities to review the inadvertent dilution of the Unit 2 spent fuel pool on August 12, 1997. The event occurred during the installation of a modification to provide 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 interdepartmental 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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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,

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:

Mr. Steve Olea Arizona Corporation Commission 1200 W. Washington Street Phoenix, Arizona 85007

Douglas K. Porter, Senior Counsel Southern California Edison Company Law Department, Generation Resources P.O. Box 800 Rosemead, California 91770



Chairman
Maricopa County Board of Supervisors
301 W. Jefferson, 10th Floor
Phoenix, Arizona 85003

Aubrey V. Godwin, Director Arizona Radiation Regulatory Agency 4814 South 40 Street Phoenix, Arizona 85040

Angela K. Krainik, Manager Nuclear Licensing Arizona Public Service Company P.O. Box 52034 Phoenix, Arizona 85072-2034

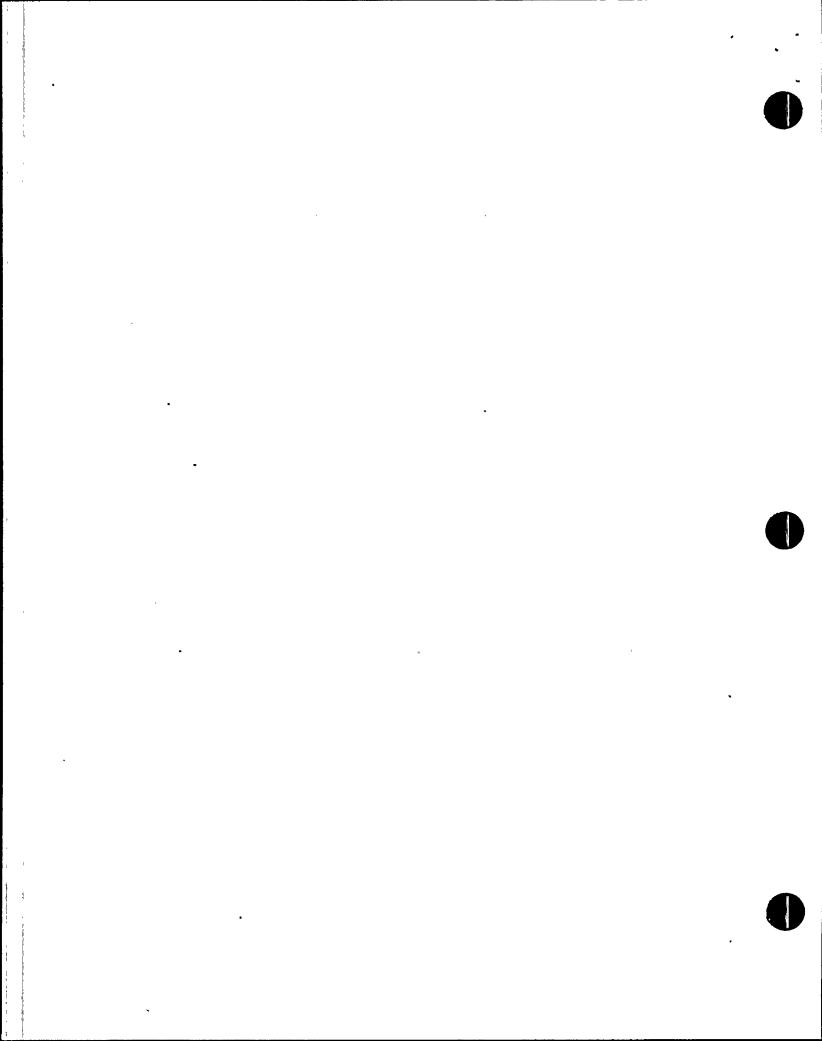
John C. Horne, Vice President Power Supply El Paso Electric Company 2025 N. Third Street, Suite 220 Phoenix, Arizona 85004

Terry Bassham, Esq. General Counsel El Paso Electric Company 123 W. Mills El Paso, Texas 79901

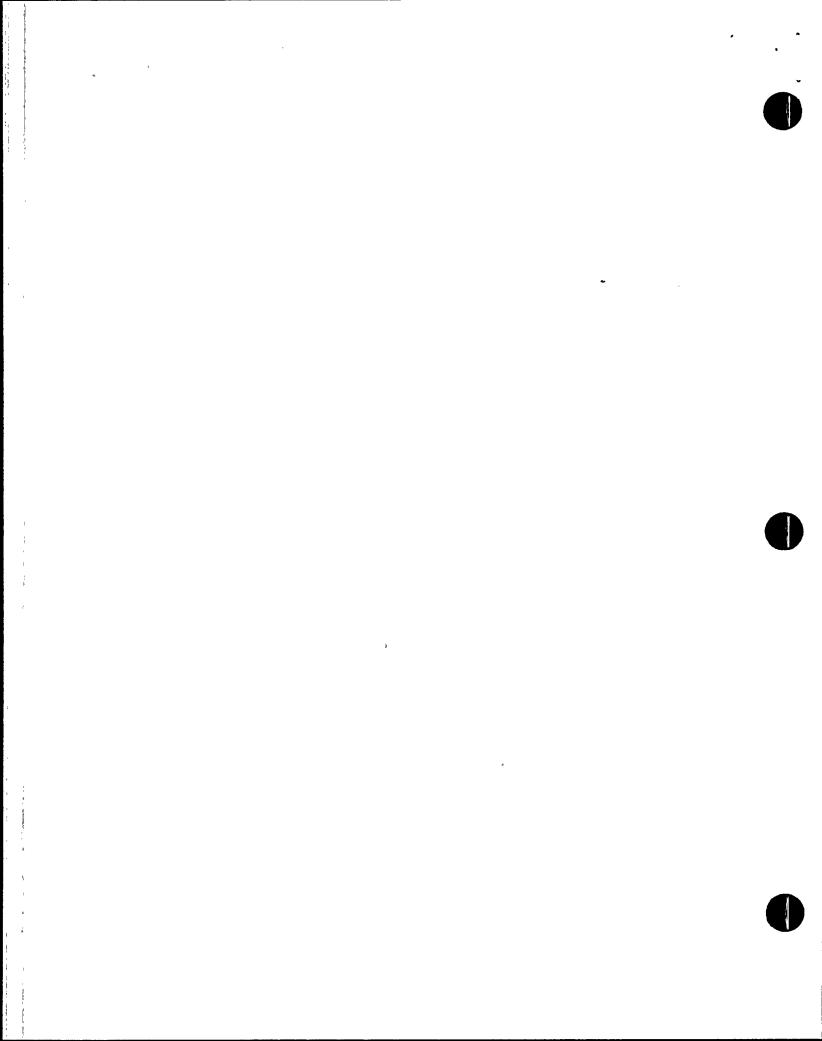
Mr. Robert Burt
Los Angeles Department of Water & Power
Southern California Public Power Authority
111 North Hope Street, Room 1255-B
Los Angeles, California 90051

Mr. David Summers
Public Service Company of New Mexico
414 Silver SW, #0604
Albuquerque, New Mexico 87102

Mr. Brian Katz Southern California Edison Company 14300 Mesa Road, Drop D41-SONGS San Clemente, California 92672



Mr. Robert Henry Salt River Project 6504 East Thomas Road Scottsdale, Arizona 85251



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 (IEO1)

bcc distrib. by RIV:

Regional Administrator

DRP Director

Branch Chief (DRP/F, WCFO)

Senior Project Inspector (DRP/F, WCFO)

Branch Chief (DRP/TSS)

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DRS AI 97-G-0125

Resident Inspector

DRS-PSB

MIS System

RIV File

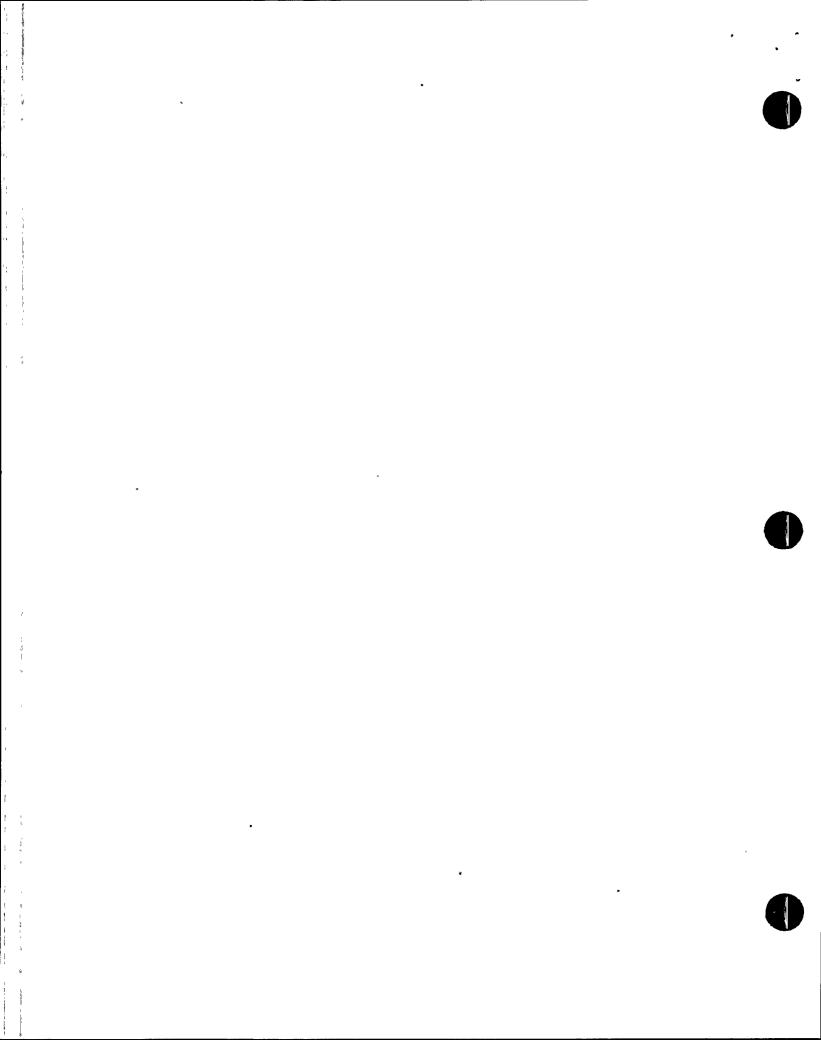
M. Hammond (PAO, WCFO)

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bcc distrib. by RIV:

Regional Administrator DRP Director Branch Chief (DRP/F, WCFO) Senior Project Inspector (DRP/F, WCFO)

Branch Chief (DRP/TSS)

WCFO File

DRS AI 97-G-0125

Resident Inspector

DRS-PSB MIS System RIV File

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