

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 50-528/83-15

Docket No. 50-528

License No. CPPR-141

Licensee: Arizona Public Service Company  
P. O. Box 21666  
Phoenix, Arizona 85036

Facility Name: Palo Verde Nuclear Generating Station - Unit 1

Inspection at: Palo Verde Site (Wintersburg, Arizona)

Inspection conducted: May 3-6 and 10-13, 1983

Inspector: *P. H. Johnson* 6/21/83  
P. H. Johnson, Reactor Inspector Date Signed

Approved by: *T. Young, Jr.* 6-22-83  
T. Young, Jr., Chief Date Signed  
Reactor Projects Section No.2

Summary:

Inspection on May 3-6 and 10-13, 1983 (Report No. 50-528/83-15)

Areas Inspected: Routine, unannounced inspection of plant procedures, nonroutine events, safety committee activities, followup on previous inspection items, and independent inspection effort. The inspection involved 57 inspector-hours onsite by one NRC inspector.

Results: No violations were identified. One deviation was identified (delay in issuing administrative procedure - paragraph 2.a).

## DETAILS

### 1. Persors Contacted

- \*J. R. Bynum, Manager of Nuclear Operations
- J. M. Allen, Technical Support Manager
- \*R. A. Bernier, Operations Supervisor
- \*T. Bloom, Licensing Engineer
- T. L. Cotton, Engineering Manager
- \*W. F. Fernow, Administrative Support Manager
- \*J. E. Kirby, Startup Manager
- \*S. M. Moyers, Maintenance Superintendent
- \*C. N. Russo, Operations Quality Assurance/Quality Control Manager
- \*J. G. Self, Shift Technical Advisor/Independent Safety Engineering Group (STA/ISEG) Supervisor
- \*V. Tersini, Supervisor, Drawing and Document Control
- \*R. E. Younger, Unit 1 Operations Supervisor

The inspector also talked with and interviewed other licensee personnel, including licensed operators, document control personnel, engineers, and QA/QC representatives.

\*Denotes those attending the exit interview.

### 2. Plant Procedures

Further progress was observed during this inspection in the definition and development of the plant procedures program. During the previous inspection of this area (Inspection Report No. 50-528/83-06), the licensee made commitments to:

- Establish Station Manual review and approval methods and reissue Procedure 70AC-0ZZ02 (Review and Approval of Station Procedures) by April 15, 1983.
- Update the listing of required procedures in the Plant Document Register (PDR) by April 29, 1983.

Further inspection related to the Plant Procedures area resulted in the following findings:

- a. Procedure 70AC-0ZZ02, Revision 5, was reviewed by the Plant Review Board (PRB) on April 15, 1983, and approved by the Manager of Nuclear Operations on May 6 (the inspector's review of this procedure is discussed in paragraph 3.a of this report). The licensee was advised that this represented a deviation from the commitment identified above in that the procedure was to have been issued by April 15, 1983. (83-15-01)
- b. Changes to bring Section 6.0 of the proposed Technical Specifications (TS) into agreement with the procedure review and approval process were still being developed by the licensee (83-06-08, open). The inspector reviewed a draft of the proposed changes and presented verbal comments to the licensee.

- c. The procedures listing in the PDR had been updated in keeping with the other commitment identified above (83-06-07, closed). Review of the PDR procedures listing is discussed in paragraph 4 of this report.
- d. The inspector selected a representative sample of ten plant procedures and examined each for proper review and approval, control of distribution, and presence of the proper revision in working files. No discrepancies were identified except for two procedures which should have received a nuclear safety review (as specified in proposed TS 6.8.1 and Regulatory Guide 1.33). This will be examined further during future review of the PDR.

No violations were identified. One deviation was identified as discussed in paragraph 2.a above.

### 3. Procedure Reviews

The inspector reviewed certain licensee procedures during this inspection and presented comments to the licensee as follows:

- a. 70AC-0ZZ02, Procedure Review and Approval, Revision 5. Earlier comments on this procedure had been resolved or are included in the following (82-36-03, 82-36-05, and 82-36-06, closed). Comments were presented on Revision 5 as follows (83-15-02):
  - The licensee stated that Procedure 20AC-0ZZ01 (Review and Approval of Security Procedures) would be cancelled, this activity having been included within the scope of 70AC-0ZZ02.
  - The definition of Administrative Control Procedure (ACP) was not sufficiently broad. Section 3.9 of Revision 5 defined the scope of ACPs to include those required by Technical Specification 6.8. Other administrative procedures which are safety related or are issued in response to regulatory requirements should also be included (refer to proposed Technical Specification 6.5.1.6.a).
  - The term "Safety Evaluation" was not used with consistent meaning in sections 4.6, 5.5.3, and 5.5.4. Also refer to the use of this term in 10 CFR 50.59. The licensee was considering a separate procedure to define the safety review process.
  - In Section 5.6 2.2, any implementing procedure (a) with comments which cannot be resolved among the Procedure Review Group (PRG) members or (b) which the PRG feels may involve an unreviewed safety question should be submitted to the PRB for review.
  - The flow chart of Appendix A showed no exit from the Nuclear Safety Evaluation block.
  - Management should designate a qualified individual or group to determine whether a Nuclear Safety Review is required.

- b. 40AC-9ZZ02, Conduct of Shift Operations, Revision 0. Comments were as follows (83-15-03):
- Shift staffing requirements were to be revised to agree with the most recent changes to the proposed Technical Specifications (TS).
  - Section 5.4.1 did not give sufficient definition on the types of information to be included in the Control Room Log. It was also not clear regarding who must sign the log (two Nuclear Operator IIs will be on duty; Section 4.4.5 also assigns the Assistant Shift Supervisor responsibility for this log).
  - Sections 5.4.6 and 5.4.9.4 did not clearly define the use and distribution of the Technical Specification Component Condition Record Log, particularly while the component is out of service.
  - Appendix H defined the "At the Controls" area as used in 10 CFR 50.54k and Regulatory Guide 1.114. The licensee should also define the term "Control Room" as used in shift staffing requirements.
  - The last sentence of Section 5.5.1 was not in agreement with the proposed TS. In Section 5.6.2, the word "effect" should be changed to "affect" to be consistent with 10 CFR 55.4(f).
- c. 70AC-0ZZ15, Procedure Review Group, Revision 0. Comments were as follows (83-15-04):
- The licensee was planning to have the STA/ISEG Supervisor serve as Procedure Review Group (PRG) Chairman, although this was not defined in writing. The inspector stated that continued service of the STA/ISEG Supervisor as PRG Chairman after fuel load should be examined by the licensee to ensure that this assignment will not detract excessively from his principal responsibilities as STA/ISEG Supervisor.
  - The quorum required for a PRG meeting should be defined. The inspector stated that a majority of the members appeared to be adequate provided all members had reviewed the procedure and submitted comments before the meeting.
  - Training implementing procedures (TRs) should be included in the definition of PRGs (Appendix A).

No violations or deviations were identified.

#### 4. Review of Plant Document Register

As discussed in paragraph 2.c above, the licensee had provided a listing of required plant procedures in the Plant Document Register (PDR). Review of a copy of the PDR resulted in the following findings (83-15-05):

- a. Section 6.8.4 of the Proposed Technical Specifications identifies five programs which must be addressed in the licensee's programs and/or procedures. Most did not appear to be addressed in the PDR listing.
- b. The licensee should ensure that administrative controls are provided for the following:
- Tagging and clearance (new procedure planned for operating phase).
  - Locked valve/breaker control and verification.
  - Control of overtime (addressed for operations personnel in 40AC-9ZZ02, but must also be addressed for other personnel who perform safety-related functions).
  - Call-in of personnel.
  - Valve/breaker lineup checks (e.g., when required, how performed, who determines when required, plus provisions for independent verification of equipment important to safety).

The licensee stated during a subsequent telephone conversation that all administrative control procedures required for fuel load and plant operation will be issued by July 1, 1983. (83-15-06)

- c. A number of maintenance procedures required for operating activities were not included in the PDR listing (e.g., Reactor Vessel Head Assembly/Disassembly, RCP Seal Replacement, Valve Operator Maintenance/Repair). Some of these had been identified by the Maintenance Department and were in preparation.
- d. Operating procedure coverage did not appear to be provided for (a) 525 Kv Power and (b) the Reactor Control (SF) System. The inspector also questioned whether coverage for cold layup of the steam generator secondary side had been provided. One series of procedures (410P-1AB01 through AB46) was observed not to be numbered as prescribed in Procedure 70AC-0ZZ01, Procedure Format, Content, and Numbering. The licensee was reviewing these areas.
- e. The listing of proposed surveillance test procedures will be reviewed during a future inspection. During a discussion which included the Senior Resident Inspector and licensee representatives developing the surveillance program, the inspectors stated that surveillance procedures (STs) required for the operating phase (except for some long lead-time items such as refueling outage surveillances, to be identified by the licensee) should be provided by 60 days prior to fuel load. The inspectors stated that the licensee should, with few exceptions, also perform all STs at least once prior to fuel load to validate the procedures and verify consistency of results with those obtained during preoperational testing.

- f. During a telephone conversation subsequent to the inspection, the licensee established a commitment to update the PDR procedures listing by June 15, 1983, to include all plant procedures required for fuel load, indicating which require nuclear safety review.

No violations or deviations were identified.

5. Nonroutine Event Review

The reporting of nonroutine events (Licensee Event Reports (LERs), 10 CFR 50.72 reports, and others) was discussed with licensee representatives. Administrative Control Procedures related to reporting requirements were still being prepared. The inspector noted that a regulation soon to be issued, 10 CFR 50.73, would significantly change the scope of LER requirements effective January 1, 1984.

No violations or deviations were identified.

6. Safety Committee Activities

The inspector examined a revised Plant Review Board (PRB) charter (Procedure 70AC-OZZ06, Revision 4) which had been issued since the previous inspection. Several earlier comments had been resolved (82-06-10, 82-18-01, and 83-06-02, closed). Comments remaining to be addressed by the licensee were as follows (83-15-07):

- The charter did not call for recommended changes to the Security and Emergency Plans and their implementing procedures to be provided to the Safety Audit Committee (as does section 6.5.1.6 of the proposed TS).
- The PRB review requirements identified in Section 6.5.1.6, items l, m, and n, of the proposed TS had not been incorporated into the charter.
- Section 5.5 should be revised to more clearly define approval and distribution of the PRB minutes (e.g., it was not clear whether the section was discussing distribution of draft minutes for PRB review, or approved minutes for final distribution).

No violations or deviations were identified.

7. Licensee Actions on Previous Inspection Findings

The inspector verified that the licensee had taken actions in response to certain previous inspection findings, as follows:

- The relationship of the Startup QA Manual (SUQAM) to the FSAR and the Operations QA Criteria Manual had been defined in Startup QA Directive (SUQAD) 2.0, Revision 1, paragraph 2.0. (83-06-04, closed)

- The Startup QA Department had provided clearer definition of the scope of their QA audit program. This item remains open, however, until similar actions are completed by the Operations QA Department. (82-06-05, open)
- Instructions addressing the disposition of Startup QA/QC records had been issued (SUQAD 6.0, Revision 1). (83-06-01, closed)

8. Exit Interview

The inspector met with APS representatives (denoted in paragraph 1) on May 13 at the Palo Verde site. The inspection findings identified in paragraphs 2 through 7 were discussed. Management representatives acknowledged the apparent deviation identified by the inspector, as discussed in paragraph 2.a of this report.

During a telephone conversation subsequent to the inspection, an APS management representative committed APS to do the following:

- Issue all administrative control procedures required for fuel load and plant operation by July 1, 1983 (paragraph 4.b).
- Update the PDR procedures listing by June 15, 1983 (paragraph 4.f).