

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 50-528/82-36

Docket No. 50-528 License No. CPPR-141 Safeguards Group _____

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: December 8-10, 1982

Inspector: *P.H. Johnson* 1/11/83
P. H. Johnson, Reactor Inspector Date Signed

Approved by: *PPNault for* 1/11/83
T. Young, Jr. Date Signed
Chief, Reactor Projects Section No. 2

Summary:

Inspection on December 8-10, 1982 (Report No. 50-528/82-36)

Areas Inspected: Routine, unannounced inspection of plant procedures; also included independent inspection effort. The inspection involved 22 inspector-hours onsite by one NRC inspector.

Results: No deviations or items of non compliance were identified.

- b. The term "Safety Related" was defined in Procedure 73AC-OZZ01 as it applies to structures, systems, components, and spare parts. The term was also defined in Procedure 10AC-OZZ01 as it applies to procedures, although the use of the "Safety Related" stamp on approved procedures was not consistent with this definition or with the term "Nuclear Safety Review Required." The meaning and use of the term "Safety Related" for procedures should be clarified. (82-36-02)
- c. The applicant was maintaining a current index of plant procedures which have been issued. A computerized listing was also available of procedures yet to be written. A single listing of programs and procedures required for facility operation was not available, and the index and computerized listing did not accurately reflect which procedures are required to be reviewed by the PRB, as specified in section 6.8 of the PTS. A number of procedures already issued without PRB review will have to be reapproved and reissued following PRB review. This was discussed further during the exit interview.
- d. Review and approval requirements for procedure cancellation should be the same as for procedure issuance. (82-36-03)
- e. The cover sheet for procedures requiring PRB review should identify the date or meeting minutes of the PRB meeting which accomplished the review. (82-36-04)
- f. Procedure 70AC-OZZ02 provided for the issuance of Procedure Change Notices (PCNs) to make changes to portions of procedures. Permanent or temporary PCNs could be issued, and permanent PCNs could also receive temporary approval. The following observations were made regarding the use of PCNs (82-36-05):
 - The PCN nomenclature (e.g., temporary approval of a permanent PCN) appeared to be subject to misunderstanding. The expiration of temporary PCNs should also be identified. The inspector observed that, although some could be implemented immediately by means of the temporary approval process, all PCNs could be issued for limited duration; i.e., effective until: (1) a prescribed date, (2) termination of a specified situation or plant condition, or (3) incorporated into a procedure revision.
 - Procedure 70AC-OZZ02 allowed up to five PCNs to be in effect before a procedure revision would be required. This number of PCNs may be too high to permit straightforward use of procedures, particularly if the PCNs are not brief and concise. Examination of PCNs issued to date showed that some involved substantial procedure changes.
- g. Additional specific comments on procedure 70AC-OZZ02 (Revision 4) were given to the applicant as follows (82-36-06):
 - Section 4.0 did not identify the responsibilities of the PRB.

DETAILS

1. Persons Contacted*

J. R. Eynum, Manager of Nuclear Operations
J. A. Roedel, Corporate Quality Assurance Manager
C. N. Russo, Operations QA/QC Manager
J. Kolski, Startup QA Supervisor
J. M. Allen, Technical Support Manager
W. F. Fernow, Administrative Support Manager
T. L. Cotton, Engineering Manager
R. W. Kramer, Licensing Supervisor
S. M. Meyers, Maintenance Superintendent

The inspector also talked with other individuals, including licensing and document control personnel.

*All persons listed above were present at the exit interview.

2. Actions on Previous Inspection Findings.

(82-06-04, 82-06-11, 82-06-12, 82-15-01, and 82-18-04, Closed) Procedure Review and Approval: Except as reiterated in paragraph 3, these items were found to have been resolved.

3. Plant Procedures

During this inspection the inspector further examined the establishment and implementation of administrative controls for the review and approval of plant procedures which will be required for use after issuance of the operating license. These administrative controls were defined in Procedure 70AC-OZZ02, Revision 4, "Review and Approval of Station Manual Procedures."

Comments regarding review and approval of plant procedures were identified in Inspection Reports 82-06, 82-15, and 82-18. Comments from these earlier inspections which are still pertinent are listed below, along with observations which resulted from the current inspection.

- a. Inconsistency still existed between the review and approval methods defined in procedure 70AC-OZZ02 and those specified in the Proposed Technical Specifications (PTS) and the Plant Review Board (PRB) Charter, Procedure 70AC-OZZ06. Specifically, 70AC-OZZ02 provided for the utilization of a Procedure Review Group (PRG) concept, whereas the PTS and PRB Charter did not. This was discussed further during the exit interview. The inspector also stated that the applicant should designate those individuals who would be assigned PRG duties, and should ensure that PRG and PRB members are familiar with procedure review requirements such as PTS 6.8, Regulatory Guide 1.33, ANSI-N18.7, 10 CFR 50.59, related PVNGS procedures, and other pertinent documents. (82-36-01)

- Section 5.2 and the Procedure Process Record should establish that no TS change is required, even if a 50.59 Safety Evaluation (for unreviewed safety questions) is not required.
- Section 5.2.4.6 should note that submittals to the NRC require prior PRB and SAC review.
- Section 5.9.1.2 stated that revision of a procedure constitutes a periodic procedure review. This would be considered appropriate provided that the review is documented on a copy of Appendix H, Periodic Procedure Review Control Form.
- In Appendix I, the certification "Deletion of this document does not produce a lessening of commitments ... etc" should be made by the responsible Division or Department Head, not by the QA Department representative. With regard to procedure cancellation, also see paragraph 3.d above.
- The procedure should recognize that the PRG is provided as an aid to the PRB, and that involvement of a PRG is not required; i.e., a procedure requiring review could be sent to the PRB without first going to a PRG.

4. Exit Interview.

The inspector met with APS representatives (denoted in paragraph 1) at the close of the inspection. The inspection findings set forth in paragraph 3 were discussed. In addition, the following commitments and clarifications were established:

- The applicant stated that a listing of all plant procedures required for the operating phase would be prepared; compared with Proposed Technical Specifications (PTS), FSAR, and other requirements or commitments; and provided to the NRC by February 15, 1983 (paragraph 3.c). (82-36-07)
- With regard to procedure review and approval, PVNGS management stated that the Plant Review Board (PRB) would review all procedures as specified in the PTS, with the Procedure Review Groups functioning in an advisory capacity to the PRB. The applicant stated that procedure review and approval methods would be made consistent with the PTS and the PRB Charter as soon as feasible (paragraph 3.a).
- Section 6.8.2 of the PTS states that the procedures of 6.8.1 will be approved by the Manager of Nuclear Operations or his "designated alternate". The inspector stated that delegation of this responsibility more than one level down in the facility organization would not be considered appropriate.

- The inspector observed that Section 13.5.1.2 of the FSAR commits the applicant to have all administrative procedures issued by six months prior to Unit 1 fuel load. Section 6.5 of the FSAR and Appendix B of Regulatory Guide 1.68 also state that the applicant will make copies of procedures for conducting operating activities available to the NRC by 60 days prior to fuel load. Based upon the exit interview and a subsequent telephone conversation, it was understood by PVNGS management and the inspector that "procedures for conducting operating activities" means all programs and procedures required for the operating phase; e.g., as specified in Section 6.8 of the PTS. The inspector stated that procedures for activities to be conducted significantly after fuel load (e.g., future outage-related activities) could be nominated by the applicant for issuance at a later time.