

50.55(e) Report

RECEIVED
NRC

ARIZONA



PUBLIC SERVICE COMPANY

STA. 3003

P.O. BOX 21666 - PHOENIX, ARIZONA 85036

October 25, 1982

ANPP-22093-GHD/59K

U. S. Nuclear Regulatory Commission
Region V
Creskide Oaks Office Park
1450 Maria Lane - Suite 210
Walnut Creek, California 94596-5368

Attention: Mr. D. M. Sternberg, Chief
Reactor Projects Branch 1

Subject: Final Report - DER 82-8
A 50.55(e) Report Relating to G.E. Switchgear Has Parts
Not Certified By Subsuppliers For Nuclear Use
File: 82-019-026
D.4.33.2

- Reference:
- (A) Telephone Conversation between T. Bishop and G. Duckworth on March 11, 1982
 - (B) ANPP-20651, dated April 7, 1982 (Interim Report)
 - (C) ANPP-21254, dated June 22, 1982 (Time Extension)
 - (D) ANPP-21673, dated August 25, 1982 (Time Extension)

Dear Sir:

Attached, is our final written report of the deficiency referenced above, which has been determined to be Not Reportable under the requirements of 10CFR50.55(e).

Very truly yours,

E. E. Van Brunt, Jr.
APS Vice President
Nuclear Projects Management
ANPP Project Director

EEVBJr/GHD:db

Attachment

cc: See Attached Page 2

IE27

U. S. Nuclear Regulatory Commission
Attention: Mr. D. M. Sternberg, Chief
Page 2

October 25, 1982
ANPP-22093-GHD/BSK

cc: Richard DeYoung, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

T. G. Woods, Jr.
J. A. Roedel
D. B. Fasnacht
G. C. Andognini
A. C. Rogers
B. S. Kaplan
W. E. Ide
J. Vorees
J. A. Brand
A. C. Gehr
W. J. Stubblefield
W. G. Bingham
R. L. Patterson
R. W. Welcher
R. M. Grant
D. R. Hawkinson
L. E. Vorderbrueggen
G. A. Fiorelli

Lynne Bernabei, Esq.
Harmon & Weiss
1725 "I" Street, NW
Suite 506
Washington, D. C. 20006

R. L. Greenfield
Assistant Attorney General
Bataan Memorial Building
Santa Fe, New Mexico 87503

FINAL REPORT - DER 82-8

DEFICIENCY EVALUATION 50.55(e)

ARIZONA PUBLIC SERVICE COMPANY (APS)

PVNGS UNITS 1, 2 & 3

I. DESCRIPTION OF DEFICIENCY

Section 4.12.3 of specification 13-EM-009 requires the supplier to certify that the metalclad switchgear has been manufactured in compliance with an applicable QA Program and that the equipment meets the requirements of the procurement documents.

Contrary to the above, installed components to the switchgear supplied and certified by General Electric to purchase specification 13-EM-009 were later identified by Attachment 1 as not in compliance with purchase specification. The vendors supplying component parts to General Electric refused to certify certain parts for nuclear use; however, alternate parts which have been certified were being furnished as replacements. This DER was initiated to document the evaluation of a concern that equipment was being delivered prior to being fully qualified, since GE did not submit a Supplier Deviation Disposition Request (SDDR) or equivalent document prior to initial shipment of the equipment. (See Attachment 4.)

II. ANALYSIS OF SAFETY IMPLICATIONS:

This condition is evaluated as not reportable. As evidenced by Attachments 2 & 3, the IE breakers and relays in question are in the process of being qualified and the environmental report has not yet received Bechtel Status 1. However, the equipment was shipped and accepted by Bechtel with the understanding that a deviation did not exist since all equipment would eventually be qualified prior to fuel load by performing any rework or modification which might be required.

This condition is being controlled by Bechtel's Internal Procedure IP-5.22, Revision 3, which has been specifically implemented to assure that all Class IE equipment is properly certified prior to fuel load. This procedure also provided guidance on how qualification failures and/or problems will be dealt with by project engineering. APS Nuclear Engineering further reviews this condition under Nuclear Projects Department Procedure NS-15, Equipment Qualification.

III. CORRECTIVE ACTION

1. Nonconformance reports EJ-1147, 1467, 1468 and 1469 will be dispositioned to replace the identified components as directed by General Electric. This action will correct all equipment deliveries to the jobsite.
2. GE's IEEE 323 qualification report, seventh submittal, is currently being reviewed by Bechtel. Final resolution and assignment of Status 1 to this document will document that all technical concerns have been resolved.

3. Attachment 3 documents that GE will revise and resubmit all related drawings, bill of materials, etc., to reflect as-built conditions.

ATTACHMENTS

1. General Electric letter H.O. Champion (Burlington, Ia) to Dick Barrett (I&SE-Phoenix, A3) dated December 2, 1980.
2. General Electric letter L. R. Fickel to W. G. Bingham dated April 22, 1982.
3. General Electric letter E. Philippi to W. G. Bingham dated July 26, 1982.
4. APS Quality Assurance Finding SF-47 dated December 20, 1981.

DIAL COMM. 8*326-6424

DATE. December 2, 1980

COPIES: W.C. Adams-Phil.
S.L. Barbagiovanni-Burl.
F.J. Stapleton

DEPT. Switchgear Business Department
P.O. Box 488

ADDRESS. Burlington, IA 52601

SUBJECT. NUCLEAR MODIFICATION
CUST: Arizona Public Serv. Co.
Palo Verde #1, #2, & #3
REQN: 480-54640
S.O.: 929599, 900, 903, 904, 906, & 907

Attachment 1 to DER 82-8

TO: Mr. Dick Barrett-I&SE
General Electric Co.
P.O. Box 10419
Phoenix, AZ 85064

RECEIVED GEN. ELEC.
DEC 8 1980
I. & S. E. PHOENIX

Attached you will find a listing of parts which need to be changed out in the subject Switchgear Equipment.

The vendors who supplied these parts have now refused to certify these parts for Nuclear use.

We would request that you supply us with an estimate for making these modifications on a complaint basis.

Engineering assures me that each part is directly interchangeable with the part it replaces and no rewiring is required.

Thank you,

H.D. Champion
H.D. Champion
Product Service-536
Burlington, IA

Donna
W. L. Anderson
x286

HDC/dmj

Attachment

TELECOPY	
DATE: 7-P-PI	<input checked="" type="checkbox"/>
TO: <i>A. Marino Sr.</i>	
FROM: <i>P. H. Anderson</i>	

NCR ES 1467

GENERAL ELECTRIC

**ELECTRIC UTILITY
SALES DIVISION**

GENERAL ELECTRIC COMPANY, 9350 E. FLAIR DR., EL MONTE, CALIFORNIA 91734
Phone: (213) 572-5200
MAILING ADDRESS: P.O. BOX 2830, TERMINAL ANNEX, LOS ANGELES, CALIF. 90051

April 22, 1982

Bechtel Power Corporation
P.O. Box 60960, Terminal Annex
Los Angeles, California 90060

Attention: W. G. Bingham

Reference: Arizona Nuclear Power Project
P.O. 10407-EM-009
4.16KV Class 1E Switchgear
D.E.R. No. 82-8

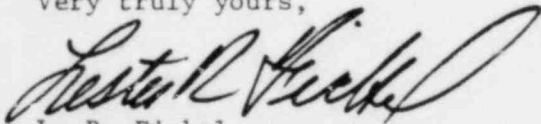
Gentlemen:

At the time this equipment was shipped, the 1E breakers and relays in question were in the process of being qualified and the environmental report had not yet received Bechtel status 1. However, the equipment was shipped with the understanding that a deviation did not exist since all equipment would eventually be qualified.

Sometime after the equipment was shipped, the manufacturers of certain breakers and relays, General Electric and Agastat, decided not to qualify the particular models we had shipped. In accordance with our commitment to comply with qualification requirements, the GE breakers have been replaced and the Agastat relays will be replaced in the near future with fully qualified equipment.

Since a nonconformance or deviation did not exist, GE does not feel that it was necessary to issue a SDDR.

Very truly yours,



L. R. Fickel
Sales Engineer

LRF/kc

cc: M. Torikian, Bechtel - LA

105426

JOB 10407	
FILE <u>EM-009</u>	
APR 26 '82	
B	A
3	RELAY
2	1E SWITCH
1	4.16KV CLASS 1E SWITCHGEAR
	AGASTAT RELAY
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT
	COUPLER 1
	COUPLER 2
	PIPE
	W/
	AGASTAT RELAY
	TR
	TR
	AGASTAT

GENERAL ELECTRIC

Attachment 3 to DER 82-8

ELECTRIC UTILITY

SALES DIVISION

GENERAL ELECTRIC COMPANY, 9350 E. FLAIR DR., EL MONTE, CALIFORNIA 91734
 Phone: (213) 572-5200
 MAILING ADDRESS: P.O. BOX 2830, TERMINAL ANNEX, LOS ANGELES, CALIF. 90051

July 26, 1982

Bechtel Corporation
 P. O. Box 60860, Term. Annex
 Los Angeles, California 90060

Attention: W. G. Bingham

Subject: ANPP - Palo Verde
 EM-009
 Swgr. MOC 205602
 G. E. Reqn. 480-54640
 Qualification Report

MT
8/3/82

171138
 JOB 10'07
 FILE *EM-009*
 JUL 30 '82

R	A
3	FLW BINGHAM
2	PE STIENS
1	APC KEITH
	APC NAJARIAN
	APC ALEY
	RE BLACK
	COORD 1
	COORD 2
	POE
	PA
	PE WRI (SFO)
	PA DA
	ARCH
	C/S
	CONTROLS
<i>CL</i>	ELECT
	MECH
	NUCLEAR
	PLANT DESIGN
	STR & SUP
<i>CL</i>	CLIENT
<i>CL</i>	PO FILE

Dear Mr. Bingham:

In response to your 6/23/82 letter in which you listed three (3) questions:

The first two questions relate to the environmental and seismic qualification. An analysis is requested to show how the seismic tests on non-certified components apply to certified environmentally qualified components. Our position on these questions is that we have completed our obligation on the environmental qualifications and we cannot continue to respond to additional requests on this report.

For example, the IEEE 323 qualification report has been revised a number of times (six revisions) at Bechtel's request. The latest revision was mailed 7/22/82 and supposedly answered all of Bechtel's questions, per the meeting of last month.

Your third request is that General Electric revise all related drawings, bill of materials, etc., to reflect replacements of unqualified components. General Electric accepts this as our responsibility and intends to do this after all modifications on the equipment are complete.

Very truly yours,

E. Phillippi
 E. Phillippi

EP/mw



QUALITY ASSURANCE FINDING

QAF Identification SF-81-47

Attachment 4 to DER 82-8

Page 1 Of 1

Project Palo Verde Nuclear Genrating Station		Activity Identification Documents Review of Purchase Specification 13-EM-009 Rev.2	
Organization Responsible Bechtel		Date Discovered 11/20/81	Date Reply Due 12/20/81
Initiator(s) D. Anderson	Controlling Document: (Section, Paragraph) 10CFR 50 Appendix B Criteria VII		Discussed With C. Drewy
Requirement Measures shall be established to assure that purchased material, equipment and services,...conform to the procurement document.			
Description of Finding Contrary to the above, installed components to switchgear equipment supplied & certified by GE to purchase specification 13-EM-009 were later identified by GE as not in compliance with the purchase specification. These components were not acceptable for nuclear application as originally certified on GE documentation. Refer to attached original C of C GE Requisition 480-54640 GE Shop Order No's: 929599, 929900 and 929903. Refer to the letter attached dated 12/2/80 from H.D. Champion. Burlington IA to Dick Barrett GE Phoenix.			
Recommended Corrective Action 1. Audit GE to determine valadity of certification provided on all GE supplied switch-gear accessories. 2. Review NCR #EJ-1147, EJ-1467, 1468, and 1469 and the above requisition and shop orders to identify significant deficiencies in certified documentation that are reportable under 10CFR 50.55 (e) 10CFR Part 21.			
Corrective Action - Including Action to Prevent Recurrence			
Prepared By _____ Authorized By _____ Date _____			
Corrective Action Evaluation			
Comments		Acceptable _____ Not Acceptable _____	Verification Required Yes _____ No _____
		Evaluator _____	Date _____
Verification			
Comments		Acceptable _____ Not Acceptable _____	
		Evaluator _____	Date _____
COPY 1 - To Responsible Organization to be Returned With Response. COPY 2 - To File. COPY 3 - Responsible Organization Copy. COPY 4 - Initiator's Copy.			