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January 13, 1984  
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REGION VISE

Mr. John B. Martin  
Office of Inspection and Enforcement  
Region V  
U. S. Nuclear Regulatory Commission  
1450 Marie Lane, Suite 210  
Walnut Creek Plaza  
Walnut Creek, CA. 94596

Subject: Palo Verde Nuclear Generating Station  
Unit 1  
Notice of Violation (50-528/83-44)  
Docket No. STN 50-528  
File: 84-019-026

Reference: Letter from T. Young, Jr. to G. C. Andognini,  
(NRC IE Report 50-528/83-44), dated December 13, 1983.

Dear Mr. Martin:

As a result of the inspection conducted on November 1-30, 1983, and in accordance with NRC Enforcement Policy, 10CFR, Part 2, Appendix C, 47-FR-9987, the following violation was identified:

Appendix B of 10CFR50, Criterion V states in part that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings."

Contrary to the above, on September 24, 1983 the No. 2 steam generator was over filled with water to the extent that water was pumped into the steam line of the steam generator. This occurred due to an incorrect valve line up which had not been properly reviewed prior to its implementation.

This is a level IV Violation (Supplement II).

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Arizona Public Service Company Response to the Notice of Violation

The Corrective Steps Which Have Been Taken and the Results Achieved:

The Independent Safety Engineering Group (ISEG) has performed a special investigation of the above noted incident. PVNGS Unit 1 Operations' personnel have responded to the four (4) primary recommendations of the special investigation. These responses were developed quickly and implemented effectively to prevent a recurrence of such an incident. A summarization of those actions follows:

Recommendations:

1. Control Room Operators must ensure that the proper flow path exists for even the most routine action. An actual line to line, valve by valve, origin to destination verification of flow path using the system status prints should be utilized.

Response: Each Crew has reviewed Operations Departmental Instruction #17, System Valve and Breaker Status, and the use of the laminated system status prints. Their importance during all system manipulations has been stressed.

2. Operations personnel should not operate equipment or systems blind, particularly where a significant parameter is out of service. They should be instructed/advised to compare the consequences of continued operation in the abnormal mode versus the conservative action of shutting down the affected system until repair is complete.

Response: Inadequate instrumentation decisions shall be made on a judgement basis by the Shift/Assistant Shift Supervisors. Specifically, the Supervisor shall determine plant, system and/or test status and priority when making the decision to operate without proper instrumentation available. The above directive was issued to all Unit 1 Shift Supervisors and was reviewed by the Unit 1 crews.

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3. Reinforce to all Operations' personnel the need for complete shift turnovers, particularly when an evolution is in progress. Also, ensure that the oncoming shift understands the scope of the evolution, its complete flow path, and any restrictions that may impact its completion.

Response: The importance of complete shift turnover has been stressed during Shift Supervisor meetings, (September 28 and November 30). The significance of complete shift turnover with regard to this situation was discussed in detail during the September 28, Shift Supervisors' meeting. Shift Supervisors discussed the matters covered during these meetings, subsequently with their crews.

4. This event emphasizes the need for Nuclear Operator III's to be questioning, and thorough, and to constantly be aware of their actions and instructions. Impress upon those personnel directly under their supervision the need to support and verify (for clarification, understanding and completeness) those instructions that address valve manipulations.

Response: Procedures and their use, especially during "off normal" evolutions, have been stressed in Operations' correspondence and directives.

Corrective Actions Which Will Be Taken To Avoid Further Noncompliance.

All actions for Unit 1 are complete.

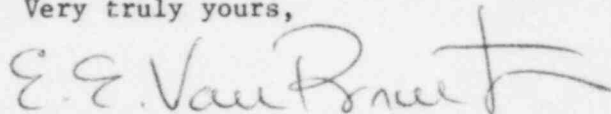
Date When Full Compliance Will Be Achieved.

We are in full compliance as of January 6, 1984.

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We feel that this response adequately addresses the concerns of the Notice of Violation. If there are any further questions, please contact Todd Bloom, (602) 943-7200, extension 6159.

Very truly yours,



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

EEVB:TB:pt

cc: Director, Office of Nuclear Reactor Regulation  
Director, Office of Inspection and Enforcement  
NRC Resident Inspector - PVNGS  
NRC Project Manager - PVNGS