

NOTICE OF VIOLATION

Arizona Public Service Company
Palo Verde Nuclear Generating Station
Wintersburg, Arizona

Docket Nos. 50-528, 50-529, 50-530
License Nos. NPF-41, NPF-51, NPF-74

During an NRC inspection conducted on January 13-23, 1992, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), as modified by 57 Fed. Reg. 5791, the violations are listed below:

A. Access Control Violation

Paragraph 2.E. of Operating License No. NPF-51, in part, requires the licensee to fully implement and maintain in effect all provisions of the Commission-approved security plan for the Palo Verde Nuclear Generating Station.

Sections 5.0, 5.2.2, and 9.0 of the licensee's approved Security Plan require that access to vital areas (islands) that are not devitalized be positively controlled.

Section 1.6.1.2 of the licensee's approved Security Plan requires that personnel entering vital areas be logged prior to entry and exit.

Section 5.0, Table 5-1, and Figures 5-13 and 5-30 of the licensee's approved Security Plan identifies portals 2F-103 and 2Y-1H04A as vital security portals, leading to the 100' elevation of the Fuel Building, and to the vital 110' elevation of the Unit-2 Spray Pond, respectively.

Contrary to the above:

On November 30, 1991, security officers posted at Unit-2 Spray Pond Hatch number 2Y-1H04A, a vital area that had not been devitalized, failed to positively control access to the vital Spray Pond by allowing five individuals to enter the vital area without first verifying that they were authorized access for entry to that vital area. The entry and exit of the individuals was properly logged. This violation lasted for approximately 4-1/2 hours.

On December 27, 1991, security officers posted at the open roll-up Door 2F-103, offering access to a vital area that had not been devitalized, failed to positively control access to the vital Fuel Building by allowing three individuals to enter the vital area without logging their names or badge numbers, and without first verifying that they were authorized access for entry to that vital area. This violation lasted for approximately 90 minutes.

This is a Severity Level IV violation (Supplement III).

B. Compensatory Measures

Paragraph 2.E. of Operating License No. NPF-51, in part, requires the licensee to fully implement and maintain in effect all provisions of the Commission-approved security plan for the Palo Verde Nuclear Generating Station.

Section 3.1.2 of the licensee's approved Security Plan requires that immediate compensatory measures be taken upon detection of any degradation of the vital area physical barriers, and that these measures remain in effect until the barrier is restored to full operational capability.

Paragraph 6.8.1 of the Facility Technical Specifications states, in part, that written procedures shall be established, implemented, and maintained covering security plan implementation.

Paragraph 3.8.1 of Security Plan Implementing Procedure No. 20SP-OSK08 states in part that "Upon discovery of lost Vital Area Barrier integrity...the Security Shift Captain or designee shall post a Security officer..."

Section 5.0, Table 5-1, and Figures 5-7 and 5-16 of the licensee's approved Security Plan identify portals 2C-301 and 2G-103 as vital security doors leading to the vital 140' elevation of the Unit-2 Main Steam Support Structure, and to the vital 100' elevation of the Unit-2 Diesel Generator Building, respectively.

Contrary to these requirements,

On July 21, 1991, a security officer discovered that vital area barrier Door 2C-301 was degraded in that it would not remain locked. This deficiency was reported to a security sergeant, but compensatory measures were not taken until 80 minutes later, rather than immediately.

On December 10, 1991, a security officer discovered that vital area barrier Door 2G-103 was degraded, in that it would not remain locked. This deficiency was reported to a security sergeant, but compensatory measures were not taken until approximately thirteen hours later, rather than immediately.

This is a Severity Level IV Violation (Supplement III).

C. Protection of Safeguards Information

10 CFR 73.21 provides that each power reactor licensee is required to ensure that Safeguards Information (SGI) is protected against unauthorized disclosure, and that while unattended, SGI shall be stored in a locked security storage container. Additionally, documents containing safeguards information shall be marked "Safeguards Information" in a conspicuous manner.

Contrary to the above, the licensee failed to properly protect Safeguards Information, in that:

- (1) on October 8, 1991, Engineering Evaluation Request 90-24-072 (dated September 24, 1990) containing SGI was discovered to have been previously distributed without being marked as containing SGI.
- (2) on four occasions, October 14, 17, November 16, 1991, and January 8, 1992, security compensatory post order books containing SGI were left unattended in several areas within the protected area.
- (3) on October 30, 1991, a packet of security shift documents containing SGI was discovered missing and has not been recovered.
- (4) on December 29, 1991, extra sheets from the mobile patrol post order book, then containing information categorized as SGI, were left unattended within the protected area.
- (5) on January 16, 1992, a packet of security shift documents containing SGI was discovered in an unattended security van.

This is a Severity Level IV Violation (Supplement III).

Pursuant to the provisions of 10 CFR 2.201, Arizona Public Service Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C., 20555, with a copy to the Regional Administrator, Region V, and a copy to the Palo Verde Resident Inspector, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reasons for the violation or, if contested the basis for disputing the violations, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, the Commission may issue an order or a demand for information as to why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

Dated at Walnut Creek, California
this 24th day of February 1992