

MAY 25 1984

Docket Nos. 50-528
50-529
50-53C

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

Attention: Mr. E. E. Van Brunt, Jr.
Vice President, Nuclear

Gentlemen:

Thank you for your letter dated May 9, 1984, informing us of the steps you have taken to correct the items which we brought to your attention in our letter dated April 10, 1984. Your corrective actions will be verified during a future inspection.

Please provide further information as specified in the attached staff review of your response.

//signed//

T. W. Bishop, Director
Division of Reactor Safety &
Projects

Attachment:
Region V Staff Review of
APS Response to Report
50-528/84-10

bcc: RSB Document Control Desk (RIDS)

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File Reference IR 50-528/84-10

RV/jk <i>PNW</i>	<i>PNW for</i> YOUNG	<i>TB</i> BISHOP
5/22/84	5/22/84	5/27/84

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REGION V STAFF REVIEW OF APS RESPONSE TO REPORT 50-528/84-10

A. Violation A - Unqualified QC

1. The APS response to Violation A, states the root problem was identified as being related to QC within the welding discipline, but did not explain how this conclusion was reached.

Since the licensee's response states that one other instance was found of an acceptance inspection of mechanical work by three different uncertified QC inspectors, and since the 1982 Torrey Pines Technology audit identified an additional example of instrumentation QC inspectors accepting weld repair work for which they were not certified, it appears that depth of the uncertified QC inspector problem needs to be fully understood.

Please explain the basis for the conclusion that the root problem was related to QC within the welding discipline and provide further explanation or assurance that other QC disciplines are not involved.

2. Since the APS response states that the Project Quality Control Engineer directed the QC inspector to perform inspections for which he wasn't qualified, what management actions have been taken to preclude a repeated improper direction?

B. Violation B - Improper HVAC Supports

1. The APS response states that no further action will be taken regarding support 301-35T-221 since a referenced drawing permits a gap. Please provide a brief explanation of the technical basis for acceptance in this case.
2. The APS response addresses actions to upgrade the Bechtel surveillance of Waldinger, but does not address the adequacy of the APS/Bechtel QA audit programs. The Bechtel full-scale audit of Waldinger Company conducted 6/6 - 13/83 resulted in several findings and corrective action requests, but a review of the quality element checklist used for the audit shows that primarily the attributes checked were records and procedures and very little hardware examination.

Per the cover letter of the above Bechtel audit (reference File No. Q.21 83-TWC-S-16 dated June 17, 1983) a previous Bechtel Quality Assurance finding (QAF 82-TWC-S-22-A dated 8/11/82) required reinspection of all quality class HVAC supports.

Please clarify whether the reinspection of Unit 2 HVAC supports had been completed and please provide your assessment of the Bechtel and APS QA audit programs in regards to identifying the cited hardware deficiencies.

C. Deviation - Use of Unqualified Duct Sealant

1. The APS response describes corrective action which addresses the area of sealant environmental qualification and use. Since the APS response also states the sealant was used by craft in unauthorized places, please clarify what assurances there are that other unauthorized work was not performed.

2. The APS response states that Waldinger is conducting a review of the usage of sealant in duct systems. The response does not provide a basis for assuring that the sealant was the only material which was not environmentally qualified. Please provide further explanation of the adequacy of controls for environmental qualification of materials in HVAC systems.