

Arizona Public Service Company

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July 20, 1984 REGION VICE  
ANPP-30011-WFQ/TJB

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

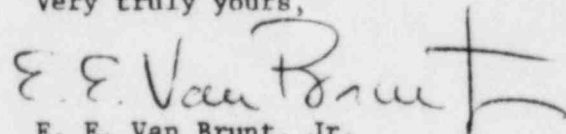
Attention: Mr. T. W. Bishop  
Division of Reactor Safety and Projects

Subject: Notice of Violation  
File: 84-019-026; D.4.33.2

Reference: NRC's Letter from T. W. Bishop to E. E. Van Brunt, Jr. dated  
June 22, 1984

This letter refers to the inspection conducted by Messrs. R. Zimmerman,  
G. Fiorelli, and C. Bosted between May 1 - June 1, 1984. Our response to  
the Notices of Violation of the referenced letter is enclosed in  
Attachment A.

Very truly yours,



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

EEVB/TJB:db

Attachment

cc: See Page Two

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Mr. T. W. Bishop  
ANPP-30011  
Page Two

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

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S. R. Frost  
K. W. Gross  
D. Canady  
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L. E. Vorderbrueggen  
E. A. Licitra

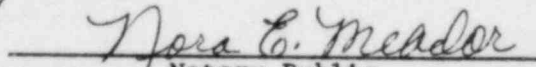
Records Center  
Institute of Nuclear Power Operations  
1100 Circle 75 Parkway, Suite 1500  
Atlanta, GA 30339

STATE OF ARIZONA )  
 ) ss.  
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President, Nuclear Production of Arizona Public Service Company, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority to do so, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true.

  
Edwin E. Van Brunt, Jr.

Sworn to before me this 20<sup>th</sup> day of July, 1984.

  
Notary Public

My Commission Expires:

My Commission Expires April 8, 1987

ATTACHMENT A

NOTICE OF VIOLATION

2. 10CFR50, Appendix B, Criterion XV, Nonconforming Materials, Parts for Components, requires that controls shall be established for the identification, documentation, and disposition of nonconforming items.

Bechtel Work Plan Procedure/Quality Control Instruction - 5.0, Nonconforming Materials, Parts or Components, Revision 25, dated February 3, 1984 requires in paragraphs 2.2 and 9.1 that a Nonconformance Report be generated to disposition nonconforming items and that such items be identified by Hold Tags, markings or other clear means of identification.

Contrary to the above, on May 3, 1984 two nonconforming mechanical seals, removed from the "A" High Pressure Safety Injection Pump on April 27 and 28, 1984 were not properly controlled in that Nonconformance Reports were not generated to disposition the nonconforming seals and the seals were not identified by Hold Tags, markings, or other clear means of identification.

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

RESPONSE TO NOTICE OF VIOLATION

I. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

On August 22, 1983, Startup NCR SM-2712 was issued describing a nonconforming seal on LPSI Pump A in Unit 1. The disposition was to replace the seal upon completion of the test that was in progress. In mid April of 1984, SWA 20205 was initiated referencing the Startup NCR and it was also dispositioned to replace the seal. Subsequently, Construction disassembled the pump, removed the defective seal and replaced it with a new seal.

Construction's procedure, WPP/QCI 31.5, limits Construction's responsibility for preparing a nonconformance report to exclude those conditions already described on a nonconformance report issued by another organization; in this case, Startup. Consequently, the removed seal was considered to be under the jurisdiction of the Startup nonconformance report. No new nonconformance report was initiated by Construction nor was a construction NCR Hold Tag placed on the seal. The seal was set aside to await further disposition instructions from Startup. The Startup NCR procedure does not require the tagging of a nonconforming item.

After reassembly of the pump with the new seal, it could not be rotated by hand. At that time Construction NCR N-A-1336 was prepared to document this problem. A Construction NCR Hold Tag was prepared and hung on the pump body. The interim disposition required disassembly of the pump to investigate the binding problem.

After disassembly, it was determined that the second seal was defective. The final disposition on NCR N-A-1336 was to replace the second seal with a third seal and deliver the unacceptable second seal to Combustion Engineering. APS supplied a third seal to be installed in the pump.

Bechtel Construction was in error by not transferring the NRC Hold Tag from the pump body to the second defective seal as required by procedure WPP/QCI 5.0. On May 3, 1984, when the Resident NRC Inspector identified the problem to Construction, NCR Hold Tags were subsequently attached to both defective seals.

Clarifying the stated findings, there were nonconformance reports generated to document both nonconforming seals. The first seal under the Startup NCR and the second under the Construction NCR. The situation leading to the finding by the NRC Resident Inspector was a lack of clearly established procedural requirements for tagging.

The construction error has been discussed with the Field Engineering and Quality Control personnel that were involved in the replacement of these seals to be sure they clearly understand the requirements for tagging nonconforming material.



II. CORRECTIVE STEPS TAKEN TO AVOID RECURRENCE:

In order to prevent recurrence of this type of problem in the future, the following corrective actions are being taken:

1. WPP/QCI 12.0 will be revised to include the requirement for applying the Construction Material Control Tag to remove parts or components that are identified as nonconforming on a Startup or Operations NCR reference in or attached to a SWA or CWO.
2. WPP/QCI 31.5 for SWAs and 31.6 for CWOs will be revised to require material control tagging for any nonconforming components removed while working to either of those documents (SWAs, CWOs) when those removed components are not otherwise tagged under the Bechtel work control program.

Therefore, with the exception of consumable materials or expendables that will be discarded upon removal, other components removed during the disassembly of equipment will be tagged by one of the following:

1. A Construction NCR Tag for those items identified on a Construction Nonconformance Report.
2. By a Material Control Tag for reuseable' items.
3. By a Material Control Tag for those items identified on systems under either Startup or Operations jurisdiction.

The Material Control Tag applied to those items identified in a Startup or Operations nonconformance report will specifically note that the item is nonconforming per the specific NCR.

As an additional measure, the changes to procedures affecting the control of material, both from a working standpoint as well as related to housekeeping, will be summarized for presentation in a Bechtel "Quality Talk" session prior to the end of August. The "Quality Talk" is planned to augment the training sessions committed to below and in notice of Violation Number 3 to achieve the widest dissemination of information as possible.

III. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The procedure changes described above will be issued and subsequently Field Engineers and QC Engineers will be trained on these new requirements. The proceures will be in effect and the training completed by August 31, 1984.

NOTICE OF VIOLATION

3. 10CFR50, Appendix B, Criterion VIII, Identification and Control of Materials, Parts and Components, requires that measures shall be established for the identification and control of materials, parts and components.

Bechtel Work Plan Procedure/Quality Control Instruction - 12.0 Storage Control of Permanent Plant Items, Revision 17, dated March 30, 1984, prescribes in paragraph 8.1 that when it is required to remove or disassemble a uniquely identified component or item in the unit after installation, and the removed or disassembled item will be left unattended or must be stored for a period of time, a Material Control Tag shall be prepared and attached to the material.

Contrary to the above, on May 17, 1984 the following examples of failure to control safety-related components and parts were observed:

An untagged pump seal and two temperature sensing units were stored on the floor of the B Low Pressure Safety Injection Pump Room among scattered tools and debris. No maintenance was in progress at the time.

An untagged pump wearing ring was randomly stored among uncontrolled material on the 80 foot level west corridor of the Auxiliary Building. No maintenance was in progress at the time.

An assortment of untagged flexitallic gaskets were stored in several rooms of the Auxiliary Building. No maintenance associated with the gaskets was in progress at the time.

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

RESPONSE TO NOTICE OF VIOLATION

I. CORRECTIVE STEPS AND RESULTS ACHIEVED:

The requirements of the material control tagging procedure were formalized with the issuance of Revision 17, WPP/QCI 12.0, on April 5, 1984. It cannot be determined that the untagged items found by the NRC Resident Inspector on May 17, 1984 had been removed from their installed locations before or after the issuance of the tagging program. In any case, when the procedure was issued, there was no attempt to walkdown or inspect the units to identify any untagged or uncontrolled material.

After the Resident Inspector's Exit Interview on May 31, 1984, APS Quality Assurance issued CAR CA-84-0154 to provide for the investigation and corrective action of concerns identified in the exit meeting.

The corrective action taken in Unit 1 includes the establishing of a walkdown team with representatives from each discipline. This team walked down the entire unit looking for housekeeping problems, for untagged or loose material, for tools not in use and to identify any unnecessary scaffolding still erected in the unit. All these types of items were identified and tagged or removed from the unit as appropriate.

All manual and nonmanual personnel in Unit 1 have been trained on the requirements of WPP/QCI 12.0 and 13.0 for material control and housekeeping respectively, this training was completed on July 6, 1984.

In Unit 2 a Superintendent is assigned to each building or group of buildings as a housekeeping "Marshall". All nonmanual personnel have been instructed to look for housekeeping discrepancies during the performance of their assigned work in the unit and they have been trained on the requirements of WPP/QCI 12.0 and 13.0 and the issues raised in CAR CA 84-0154.

Unit 3 has reinspected the power block, yard storage trailers, personnel trailers and the laydown areas. Any housekeeping or material storage problems that were identified are in the process of being resolved. All Unit 3 nonmanual personnel have been trained to the requirements of WPP/QCI 12.0 and 13.0 and the issues raised in CAR CA 84-0154.



II. CORRECTIVE STEPS TAKEN TO AVOID RECURRENCE:

- A. The corrective action taken on Violation 2 above is also applicable on this violation.

In addition, WPP/QCI 12.0 will be revised to address the disposition of consumable and expendable materials that would normally be removed and discarded and replaced with new material during the disassembly and reassembly process. Those materials not specifically identified as nonconforming, yet are materials that must be replaced during the reassembly process, will be required to be discarded, or if left unattended, tagged with the Material Control Tags.

The procedure will also be changed to require that material not re-used in the reassembly of a component (that has not been specifically dispositioned on the work control documents) be delivered to the Startup Material Control Group in the case of Systems jurisdictionally controlled by Startup and to APS Material Control in the case of systems jurisdictionally controlled by operations. When these procedure changes are issued, appropriate personnel training will be conducted.

Material, components or equipment that will be delivered as described above will be tagged in accordance with WPP/QCI 12.0 until they are received by the Startup Material Control Group or APS Material Control. The transfer of that material from the work area to the appropriate warehouse will be documented on the Request for Stored Items (RSI) form in accordance with WPP/QCI 12.0.

- B. Additionally, in mid May, 1984, APS Quality Assurance initiated a review of project procedures/programs concerning material control. The scope of this review included Construction, Startup, and Operations, emphasizing the interface controls established between organizations, as well as evaluating the effectiveness of the program from a project-wide viewpoint.

This review identified several areas where procedural enhancements are required to control materials at the interface junctures between organizations. A preliminary report was prepared in mid June, 1984, and organizations informally apprised of its contents. Based on this preliminary evaluation, APS QA convened project team meetings on July 11, 1984 and July 16, 1984 to address the material control issues on a project-wide basis and to establish a coordinated plan of action. A project team has been formed to provide the necessary procedural and programmatic enhancements.

III. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

- A. The procedure changes described in II. A. above will be issued and subsequently Field Engineers and QC Engineers will be trained on these new requirements. The procedures will be in effect and the training completed by August 31, 1984.
- B. The necessary procedural/programmatic enhancements required as a result of the effort described in II. B. above are expected to be completed by September 15, 1984.