

MEMORANDUM TO: Distribution

FROM: P. Narbut

SUBJECT: RECORD OF TELEPHONE CONVERSATION, GAP

May 25, 1984

On Friday, May 18, 1984, Ms. Lynn Bernabei of GAP called from Phoenix to the Region V office. She discussed two topics, hot functional testing and the reduced civil penalty from the CAT inspection. P. Narbut and P. Johnson answered her questions as follows:

Ms. Bernabei inquired as to how much of the hot functional testing would have to be repeated prior to core load, after core load, and or after criticality. Johnson explained that he was not the proper person to talk to, that Fiorelli/Zimmerman followed that more closely.

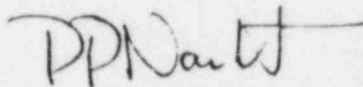
Ms. Bernabei stated she had a computer listing showing a lot of test deficiencies. The list had a note on top from G. Fiorelli that stated that these deficiencies would have to be corrected in further hot functional testing. Johnson explained that deficiencies could be prioritized and testing reverified at different times depending on the deficiency (i.e. before or after core load).

Ms. Bernabei wanted to know what tests failed. Johnson stated he didn't know.

Ms. Bernabei wanted to know if there were a lot of problems in testing. Johnson stated, yes, there were, but they are being resolved technically.

Ms. Bernabei wanted to know how the problems compared to other plants. Johnson declined to compare plants.

Ms. Bernabei stated she had heard the IE Headquarters forced the reduction in fines for Palo Verde. She asked for that to be confirmed. Narbut stated the decision was collective. Bernabei repeated the question in several different forms. Narbut stated that the subject of her question was inappropriate.



P. P. Narbut

Distribution:

L. Shollenberger
R. Zimmerman
T. Bishop
T. Young
P. Johnson

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ENFORCEMENT CONFERENCE
ARIZONA PUBLIC SERVICE
NOVEMBER 23, 1983

Attendees from Arizona Public Service

Mr. K. L. Turley, Chairman of the Board
Mr. T. G. Woods, Executive Vice President
Mr. E. E. Van Brunt, Vice President, Nuclear Projects
Mr. G. C. Andognini, Vice President, Nuclear Operations
Mr. J. A. Roedell, Corporate Quality Assurance Manager
Mr. W. E. Ide, Construction Quality Assurance/Quality Control Manager
Mr. A. C. Gehr. Esq., Snell and Wilmer
Mr. P. P. Klute, Manager of Public & Employee Information

Attendee from Bechtel Power Corporation

C. Lacey, Vice President and Deputy Division Manager

Attendees from U.S. Nuclear Regulatory Commission

Mr. J. B. Martin, Regional Administrator
Mr. T. W. Bishop, Division Director
Mr. T. Young, Jr. Section Chief
Mr. P. P. Narbut, Project Inspector
Mr. L. E. Vorderbrueggen, Resident Inspector
Mr. G. Fiorelli, Resident Inspector
Mr. A. D. Johnson, Enforcement Coordinator
Mr. P. Johnson, Project Manager

On November 23, 1983, an Enforcement Conference was held at the NRC Region V office in Walnut Creek, California with the individuals identified above. The conference was in regard to the special inspections conducted September 6-16, 26-30, October 31 and November 1, 1983, and June 1, 1982 through March 11, 1983. The inspections are documented in Inspection Reports 50-528/83-34 and 50-528/83-10 respectively.

Mr. Martin informed the licensee that the purpose of the conference was to discuss the apparent violations identified during the two inspections and scoped the discussions that were to follow.

Mr. Bishop identified the significant violations involving:

- a. Capping of the containment pressure sensing lines.
- b. The disconnected manual operator on valve V470.
- c. The position indicator on valve V402 was positioned so that the valve could only be opened 30 to 35 percent of its full opened position.
- d. 87 3/8" bolts were missing from the base frames of six motor control centers.

The less significant violations involved inadequate electrical cable separation; improper torqued bolts; pipe supports not installed properly; improper structural welds; scaffolding stored in electrical cabinets creating a fire hazard; sliding support plate had rubberized substance in it.

The Termination Card issue - some irregularities in the records, but possibly not a wide spread practice. Approximately 100 to 150 cards could have been falsified.

Mr. Woods contends that there were 2 procedures that would have caught the capping problem before operation started. Mr. Ide stated the caps were put on specifically for cleanliness; that the system was under testing when inspected by the NRC. He also stated the startup QA Manager gave orders to put the caps on; Mr. Woods apparently was unaware of this. A walk-down would not have caught the other problems.

Mr. Ide also stated that construction should have noted the deficiency with the high pressure injection suction valve (470) and did not, but he felt sure the valve malfunction would have been caught by operations; however, he admits it wasn't documented. Mr. Woods stated NRC had valid concerns regarding the valve.

Mr. Ide stated the instructions from the manufacturer were vague concerning the motor control centers and is under evaluation.

Mr. Van Brunt stated APS management hasn't talked to anyone concerning the falsification of termination cards, but will be doing so. Mr. Ide asked Mr. Martin if he thought APS should have made their own investigation concerning this problem when they were made aware of it and Mr. Martin said he thought that it would probably have been a good idea for them to have done that. Mr. Van Brunt assured NRC management that APS will make every effort to keep this from recurring.

Mr. Woods stated that APS will be cooperating with Southern California Edison in making a review and evaluation on pre-op and startup activities; a report should be out before Christmas.

He said APS will be making a reinspection of many pipe hangers and will determine what else has to be done; that all NRC's particular conclusions of overall management problems will be addressed, and followup to areas Mr. Martin has pointed out during this meeting will be made.

Mr. Turley stated that in going from construction to operations, manpower and other resources will be obtained to get the job right. He said they had found this meeting to be very helpful and now have a better understanding of APS problems, and stated there is a need to strengthen certain areas of APS management.

Mr. Martin told APS management that NRC cannot be depended upon to tell them how to run their plant.