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October 30, 1984  
ANPP-31006-TDS/TRB

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

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

Subject: Final Report - DER 84-42  
A 50.55(e) Reportable Condition Relating To Environmentally  
Qualified Torque Switches Were Replaced With Unqualified  
Torque Switches.  
File: 84-019-026; D.4.33.2

Reference: A) Telephone Conversation between J. Ball and T. Bradish on  
June 18, 1984  
B) ANPP-29993, dated July 18, 1984 (Interim Report)  
C) ANPP-30276, dated August 20, 1984 (Time Extension)  
D) ANPP-30481, dated September 11, 1984 (Time Extension)  
E) ANPP-30795, dated October 11, 1984 (Time Extension)

Dear Sir:

Attached is our final written report of the deficiency referenced above,  
which has been determined to be Not Reportable under the requirements of  
10CFR50.55(e).

Very truly yours,  
*E. E. Van Brunt, Jr.*

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

EEVB/TRB/nj  
Attachment

cc: See Page Two

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Mr. T. W. Bishop  
DER 84-42  
Page Two

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

T. G. Woods, Jr.  
D. B. Karner  
W. E. Ide  
D. B. Fasnacht  
A. C. Rogers  
L. A. Souza  
D. E. Fowler  
T. D. Shriver  
C. N. Russo  
J. Vorees  
J. R. Bynum  
J. M. Allen  
A. C. Gehr  
W. J. Stubblefield  
W. G. Bingham  
R. L. Patterson  
R. W. Welcher  
H. D. Foster  
D. R. Hawkinson  
R. P. Zimmerman  
L. Clyde  
M. Woods  
T. J. Bloom  
D. N. Stover  
J. D. Houchen  
J. E. Kirby  
D. Canady  
B. S. Kaplan

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

FINAL REPORT - DER 84-42  
DEFICIENCY EVALUATION 50.55(e)  
ARIZONA PUBLIC SERVICE COMPANY (APS)  
PVNGS UNIT 1

- I. Design Change Package (DCP) 10M-SI-302 was issued to replace environmentally unqualified torque switches in motor operators on valves 1JSIA-UV-674 and -676 with qualified switches as part of NUREG-0588 implementation. This work was completed in September of 1983 by Work Orders 23744 and 23749.

On October 16, 1983, per Nonconformance Report (NCR) SE-3095, Startup Work Authorization (SWA) 15370 was issued to troubleshoot the motor operators. The work accomplished under the SWA removed the qualified torque switches from these motor operators and replaced them with the previously removed unqualified switches.

On October 20, 1983, NCR SE-3179 was issued and documented that the original unqualified torque switches were in the motor operators on valves 1JSIA-UV-674 and -676.

Evaluation

There are two specific areas of concern that resulted from this condition:

1. Placement of unqualified torque switches on valves SI-674 and -676 motors, which are used for containment recirculation sump outboard isolation, may impair the safety function of those valves.
2. The apparent absence of procedural controls to preclude substitution of environmentally qualified parts with unqualified components may cause recurrence of this condition.

The first area of concern has been determined not to have been an adverse condition. A review of the two referenced NCRs has revealed that the reinstallation of the unqualified torque switches was deliberate. This was done in order to perform testing (troubleshoot) and isolate a valve operability problem which occurred following the installation of the new qualified switches. By temporarily returning to the old switches, it could easily be determined whether the operability problem was a result of the new switches themselves or had occurred due to some other part of the valve or operator. NCR SE-3179 documented that the torque switch substitution did not solve the problem (the valve operability problem was determined to be with the settings of the limit switches and torque switches and not with the switches themselves). The qualified torque switches were correctly installed after "troubleshooting" per SWA 15370/NCR SE-3095 was completed. A review of the NCR revealed that at no time were efforts were being directed to qualify the unqualified torque switches.

The second area of concern, as identified by CAR CA-84-0137, has been included in a project wide review of the procedures/program concerning material control.

II. Analysis of Safety Implications

Based on the above, this deficiency is evaluated as not reportable under the requirements of 10CFR50.55(e); since, if this condition were to remain uncorrected, it would not represent a significant safety condition.

III. Corrective Action

1. For the first area of concern, no corrective action is required.
2. The second area of concern will be addressed in the Final Report for DER 83-73.