

NOTICE OF VIOLATION

Arizona Public Service Company
Palo Verde Units 1, 2, and 3

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

During an NRC inspection conducted during the weeks of October 19 and November 2, 1992, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are identified below:

- A. Technical Specification 4.0.5 states in part that, "...inservice testing of ASME Code Class 1, 2, and 3 pumps and valves will be performed in accordance with ...Section XI of the ASME Boiler and Pressure Vessel Code and Addenda...."

Licensee drawing number 13-M-CHP-002, Revision 31, "P and I Diagram Chemical and Volume Control System," identifies Boric Acid Make Up Pump Discharge Check Valves CHN-V154 and CHN-V155 as Class Q1C equipment. Class Q1C is the licensee designation for safety related, seismic Class 1, ASME Class 3 equipment.

Contrary to the above, on November 3, 1992, the NRC inspectors identified that boric acid make up pump discharge check valves CHN-V154 and CHN-V155 were not in the licensee's Inservice Testing (IST) Program and were not being tested individually in accordance with Section XI of the applicable ASME Boiler and Pressure Vessel Code and Addenda.

This is a Severity Level IV violation (Supplement 1), applicable to Units 1, 2, and 3.

- B. 10 CFR Part 50, Appendix B, Criterion XVI states in part that, "Measures shall be established to assure that conditions adverse to quality, such as...deviations...and nonconformances are promptly identified and corrected."

Section 8.4.2 of Revision 6 of licensee procedure 73TI-9ZZ19 states in part that "... (an EER [Engineering Evaluation Request] per 73AC-OEE01 for non-quality related items) shall be initiated for all items reflecting an unacceptable condition."

Section 8.5.2 of Revision 4 of licensee procedure 73TI-9ZZ18 states in part that "For all quality related items reflecting an unacceptable condition an MNCR [Material Non-Conformance Report] per 60AC-OQQ01 should be initiated, and for all non-quality related items an EER [Engineering Evaluation Request] per 73AC-OEE01 should be initiated."

Pacific Valves drawing number 7-509-B (Licensee drawing number P222B-141-4) identified auxiliary feedwater pump AFN-P01 discharge check valve 3PAFN-V012 bonnet cap screws, piece 2, material as ASTM A193, Grade B7.

Section A-A of Revision 5 of licensee drawing 13SI-241-H-007 identified mechanical snubber support 3SI-241-007 as size 3, Class Q1B equipment, with an assigned load equal to 8308 pounds. Class Q1B is the licensee designation for safety related, seismic Class 1, ASME Class 2 equipment.

Contrary to the above:

- As of November 2, 1992, an engineering evaluation request was not initiated following licensee identification of unacceptable conditions identified during a visual examination of auxiliary feedwater pump AFN-P01 discharge check valve 3PAFN-V012 per procedure 73TI-9ZZ19 on April 11, 1991. The licensee's examination identified that the internal disc hinge bracket cap screw lock plate tabs were not properly bent up to lock the cap screws in place and the external bonnet cap screws were not ASTM A193, Grade B7 material or equivalent.
- As of November 5, 1992, neither an MNCR nor an EER was initiated following the licensee identification of an unacceptable condition of mechanical snubber support 3SI-241-007 during a visual examination on October 7, 1992. The visual examination identified that according to its label plate, snubber 3SI-241-007 was rated for 6000 pounds, which was less than its assigned load of 8308 pounds.

This is a Severity Level IV Violation (supplement 1), applicable to Unit 3.

- C. Technical Specification 6.8.1 states in part that, "Written procedures shall be established, implemented, and maintained covering...applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978...." Appendix A of Regulatory Guide 1.33 specifies procedures for procedure adherence in performing inspections and maintenance.

Section 6.2.2 of Revision 6 of licensee Procedure 73TI-9ZZ19, "Visual Examination of Pump and Valve Internal Surfaces," states in part that, "For [check valve] examinations all internal parts and surfaces shall be examined per Appendix B, as applicable."

Contrary to the above on March 29, 1992, the licensee performed a visual examination of check valve 1PSGE-V003 per Revision 6 of Procedure 73TI-9ZZ19 and did not examine all internal parts and surfaces per Appendix B.

This is a Severity Level IV Violation (supplement 1), applicable to Unit 1.

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 NRC Resident Inspector at the Palo Verde Nuclear Generating Station, 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 reason for the violation, or, if contested, the basis for disputing the violation, (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. Where good cause is shown, consideration will be given to extending the response time.

Dated at Walnut Creek, California
this 4th day of (December)