

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report Nos. 50-528/92-34, 50-529/92-34, and 50-530/92-34  
License Nos. NPF-41, NPF-51, and NPF-74  
Licensee: Arizona Public Service Company  
P. O. Box 53999, Station 9012  
Phoenix, Arizona 85837  
Facility Name: Palo Verde Nuclear Generating Station Units 1,2, and 3.  
Inspection at: Palo Verde Site, Wintersburg, Arizona  
Inspection Dates: October 5 - October 9, 1992

Inspector: Robert J. Pate for 12/8/92  
P. M. Qualls, Reactor Inspector Date Signed

Robert J. Pate for 12/8/92  
A. D. McQueen, EP Analyst Date Signed

Approved By: Robert J. Pate 12/8/92  
Robert J. Pate, Chief Date Signed  
Safeguards, Emergency Preparedness  
and Non-Power Reactor Branch

Summary:

Areas Inspected: Announced routine inspection of the status of the Emergency Preparedness Program and follow-up on open items. Inspection Procedures 82701 and 92701 were covered.

Results: Overall, the licensee's program is adequate in the area of emergency preparedness. One violation of NRC requirements and one unresolved item were identified and are discussed in paragraph 2.e of this report.

## DETAILS

### 1. PERSONS CONTACTED

The below listed persons were contacted during the course of the inspection.

- \*P. Caudill, Director, Site Services
- \*H. Bieling, Manager, Emergency Planning
- \*T. Barsuk, EP Onsite Supervisor
- \*B. Wolfe, EP Offsite Supervisor
- \*R. Duncan, EP Offsite Coordinator
- R. Roehler, Licensing/Compliance Supervisor
- \*B. Whitney, Quality Auditor
- \*R. Horton, Quality Auditor
- \*R. Bouquot, Supervisor, QA Audits
- \*R. Fullmer, Manager, QA&M
- \*W. Conway, Executive Vice-President
- \*P. Wiley, Unit 2 Operations Manager
- \*E. Simpson, Vice-President, Nuclear Engineering and Projects
- \*J. Levine, Vice-President, Nuclear Production
- \*R. Bernier, Licensing Supervisor
- \*R. Stevens, Director, Licensing and Compliance
- \*S. Guthrie, Director, QA/QC
- \*G. Clyde, Licensing/Compliance Engineer
- C. Bolle, Sr. EP Coordinator
- P. Coffin, Compliance Engineer
- M. Grissom, Lead STA
- R. Middleton, Unit 2 Operations Supervisor
- G. Daunoy, QA Engineer
- R. Flood, Unit 2 Plant Manager
- T. Shriver, Unit 2 Assistant Plant Manager

\* Attended Exit Meeting on October 9, 1992.

### 2. Operational Status of the Emergency Preparedness Program (82701)

#### a. Drills/Exercises

The inspectors observed the annual siren test. The test director had established good communications with observers in the field. The test director was conducting the test in accordance with approved procedures and in a professional manner. No sirens failed the test.

The inspectors verified that signs are conspicuously posted for the transient population at the locations within the EPZ where a transient population might be present. The locations inspected include the Wintersburg General Store and Rip Griffin's Truck Stop. These signs included information concerning public notification systems, plant emergencies, the radio station to monitor for EBS broadcasts, and evacuation routes.

No violations or deviations were identified.

b. Emergency Plan and Implementing Procedures

A review of the licensee Emergency Plan Implementing Procedure (EPIP) EPIP-02, Revision 09.00, titled: Emergency Classification, indicated an anomaly in Section 4.3.1 which reads:

NOTE: Events should be classified as soon as possible with a goal of classifying the situation within 30 minutes after recognizing that events have occurred which make the declaration of an emergency classification appropriate.

Title 10, Code of Federal Regulations, Part 50 (10 CFR 50), at appendix E, Subsection D.3., reads in part:

A licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency.

NUREG-0654 in appendix 1 indicates the rationale for the notification and alert classes is to provide early and prompt notification of minor events which could lead to more serious consequences given operator error or equipment failure or which might be indicative of more serious conditions which are not yet fully realized....

Prompt notification of offsite authorities is intended to indicate within about 15 minutes for the unusual event class and sooner (consistent with the need for other emergency actions) for other classes. The time is measured from the time at which operators recognize that events have occurred which make declaration of an emergency class appropriate.

Reinforcement of this guidance was issued with NRC Information Notice No. 85-80, dated October 15, 1985, (Timely Declaration of an Emergency Class, Implementation of an Emergency Plan, and Emergency Notifications), which indicated that

Licensees should not delay the declaration of an Emergency Class when conditions warrant such a declaration. Delaying the declaration can defeat the appropriate response to an emergency. It is the licensee's responsibility to ensure that adequate personnel, knowledgeable about plant conditions and emergency plan implementing procedures, are available on shift to assist the shift supervisor to classify an emergency and activate the emergency plan, including making appropriate notifications, without interfering with plant operation.

In the licensee's EPIP-02 NOTE, the phrase "Events should be classified as soon as possible" appropriately reflects NRC regulatory guidance and allows for prompt notifications to insure the public health and safety. That part of the EPIP-02 NOTE which states "with a goal of classifying the situation within 30 minutes after recognizing that events have occurred which make the declaration of an emergency classification appropriate" (emphasis added) appears inconsistent with published regulatory guidance.

To authorize or sanction a thirty minute delay in declaring an emergency, when conditions warranting such declaration are identified, appears to deny state, county, and local responders up to thirty minutes to consider and implement response to assure the public health and safety. This thirty minutes is permitted by the NOTE before the regulation established 15 minute notification time; implying that it may be permissible to delay notification of state and county response elements for up to 45 minutes after recognizing occurrence of events which make an emergency classification declaration appropriate.

The licensee indicated that this note was added to the EPIP after an NRC Augmented Inspection Team (AIT) inspection at Palo Verde in March 1989 (Inspection Report 50-530/89-13). In that event, conditions were recorded on the shift log at about 1:04 a.m. which "satisfied two Emergency Action Levels for Notification of an Unusual Event per EPIP-02." The declaration of an Unusual Event was not made until 1:39 a.m. The inspection report indicated that "The 34 minute delay between the recognition of conditions requiring classification as an Unusual Event and the declaration of Notification of Unusual Event appears excessive." In their response to the NRC AIT inspection report observation, the licensee concluded that "a review of the event indicates that the Shift Supervisor acted appropriately by directing his attention and taking the necessary time to stabilize plant conditions. The NRC has noted that the event was complicated. Placing the plant in a stable condition required the use of several procedures as well as EPIP-02 and EPIP-03. It should be noted that despite the complicated nature of this event, the actions taken by the Shift Supervisor allowed the plant to be stabilized and the emergency notification terminated in less than two hours from the onset. APS believes that the Shift Supervisor's actions were appropriate and that staffing levels are adequate."

Following this response, the licensee indicated the event circumstances were discussed with NRC and the licensee documented in internal memoranda that it was the licensee's understanding that NRC agreed with the licensee's conclusion that the time taken to classify the March 1989 event was not excessive. Based on that understanding, EPIP-02 was changed as indicated at the initial subparagraph above.

To be in conformance with regulatory guidance the classification of emergencies should occur as soon as possible. This item will be reviewed at a later inspection. (92-34-01)

c. Emergency Facilities, Equipment, Instrumentation, and Supplies

The Emergency Operations Facility (EOF), and the Technical Support Center (TSC) were toured and inspected, to include selected response equipment and supplies on hand. The centers appeared to be appropriately stocked and in a condition to be activated and made operational in a timely manner.

d. Independent and Internal Reviews and Audits

- (a) The 1992 Annual Audit Report of the Emergency Preparedness Program for Palo Verde was reviewed during this inspection. The report reflected an aggressive and probing nature in the audit. Problems were documented and referred to appropriate managers for proper analysis and resolution.
- (b) Six Quality Assurance Monitoring Reports were selected from those completed during 1992 and since the last routine emergency preparedness inspection at the site. The audits were found to be thorough and incisive, with appropriate corrective actions documented.
- (c) The Emergency Preparedness Action Items List (EPAIL) was reviewed to verify that problems are sought and identified, and that appropriate corrective actions are taken. Only two items on the list were older than two years. Actions continue to resolve all items on the list.

e. Emergency Plan Implementation

- (a) On December 23, 1991, Unit 2 had a relief valve on the Decay Heat Removal (DHR) system open spuriously when the unit was in Mode 5 (cold shutdown). The unit operations supervisor, in consultation with the operations manager and the plant manager, reviewed the safety significance of the event and decided it was not reportable to the NRC. As a result of an audit by plant QA personnel in September 1992, the event was brought to the attention of the NRC. The details of the event were reviewed during this inspection and the following was identified: (1) the leakage from the RCS was calculated to be about 180 gpm; (2) EPIP-02 Appendix B, Non-Rx Trip Event Classification Criteria, Tab 2, requires a Site Area Emergency Classification for RCS leakage greater than available charging pump capacity; (3) the leakage exceeded the capacity of all three charging pumps (132 gpm, 44 gpm per pump). The licensee's Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering Emergency Plan

Implementation. Therefore, failing to classify the event as a Site Area Emergency would normally be a significant violation. However, it is the position of the plant management that the safety significance of the event did not rise to the level consistent with a Site Area Emergency as the plant was in cold shutdown starting up from a refueling outage, the leakage was terminated in about 34 minutes, the source of the leakage was identified, and the High Pressure Safety Injection (HPSI) System was available and was used to prevent loss of pressurizer level. The pressurizer level decreased to 28% before the HPSI pump was manually started. Since a declaration of Site Area Emergency appeared to be overly conservative, this item will be addressed at a later time (92-34-02). This is an unresolved item.

- (b) Licensee procedure EPIP-02 requires that loss of all meteorological instrumentation be classified as an Unusual Event (UE). This is consistent with NRC guidance given in NUREG-0654.

On August 22, 1992, at 2245, the licensee lost all Meteorological instrumentation. The Met Tower was returned to operability at 0557 on August 23. The licensee Shift Supervisor oncoming for day shift reportedly recognized that an UE should have been declared. The event was reported to the NRC HOO at 1711 on August 23. The licensee EPIP-02 would require the classification within one half of an hour. Licensee Technical Specification 6.8.1. requires that written procedures be established, implemented, and maintained covering Emergency Plan implementation. The failure to classify the event within one half hour is an apparent violation of TS 6.8.1. (50-529/92-34-03) violation.

10 CFR 50.72 requires that events be reported within 1 hour.

### 3. Exit Meeting

An exit meeting was held on October 9, 1992 with members of the licensee staff identified in Paragraph 1 of this report. The items identified in this report were discussed at that time. One potential violation and one unresolved item were identified. No significant strengths were identified. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspectors during the inspection.