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ANPP-34930-EEVB/JYM/98.05

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

Attention: Mr. D. F. Kirsch, Deputy Director
Division of Reactor Safety and Projects

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Docket No. STN 50-528 (License NPF-41)
Response to Notice of Violation 50-528/85-31-06
File: 86-070-026; D.4.3.3.2

Reference: (A) NRC Inspection Report 50-528/85-31 letter from D. F. Kirsch
to E. E. Van Brunt dated December 19, 1985.

(B) Letter from E. E. Van Brunt to D. F. Kirsch, ANPP-34681 dated
January 17, 1986.

Dear Sir:

A request for a February 5, 1986, extension for submittal of a final response to violation 50-528/85-31-06 (modification to Diesel Generator Air Start System identified in Reference A, Attachment A, Item B) was submitted in Reference B. The response to the violation is discussed in Attachment B. In addition, Reference B stated that general areas of perceived weakness will be included in the response to the violation. This is discussed in Attachment C.

Should you have any questions concerning these matters, please contact me.

Very truly yours,

E. E. Van Brunt, Jr.
Executive Vice President
Project Director

EEVB/JYM/dlm

cc: A. C. Gehr (all w/a)
R. P. Zimmerman
E. A. Licitra
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ATTACHMENT A
NOTICE OF VIOLATION

Arizona Public Service Company
P. O. Box 21666
Phoenix, Arizona 85036

Docket No. 50-528
License No. NPF-41

As a result of the inspection conducted during the period of October 28 through November 8, 1985, two violations of NRC requirements were identified. The violations involved failure to follow the procedure controlling temporary modifications and failure to properly evaluate a change to a plant system. In accordance with the NRC Enforcement Policy, 10 CFR Part 2, Appendix C, the following violations are listed below:

- A. 10 CFR 50 Appendix B, Criterion V, as addressed in Section 17 of the Final Safety Analysis Report (FSAR), requires that activities affecting quality be prescribed by and accomplished in accordance with documented procedures.

Station Manual Procedure Number 73AC-9ZZ05, "Temporary Modification Control," Section 5.1.13, requires that independent verification of quality related temporary modifications be performed within 8 hours of the time the temporary modification is implemented.

Contrary to the above, temporary modifications 1-85-CH-320, which altered the capacity of various snubbers on quality related systems and was installed on July 27, 1985 but not verified until October 25, 1985 and temporary modification 1-85-RC-181, which altered a pipe support for the pressurizer spray line was installed but not independently verified (at the time of the inspection) to be properly implemented within 8 hours of their implementation.

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

- B. 10 CFR 50.59, paragraph (b) requires in part that changes to the facility as described in the Safety Analysis Report include a written safety evaluation which provides the basis for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, on October 31, 1985, the independent air receiver tanks of the "A" emergency diesel generator air start system were cross connected by a temporary jumper hose without a written safety evaluation being performed.

This is a Severity Level V Violation (Supplement I).

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ATTACHMENT B

Response to Notice of Violation 50-528/85-31-06

STATEMENT OF FACTS

The PVNGS design incorporates 2 emergency diesel generators. Each diesel generator (DG) has the following components associated with its starting system: Two independent and redundant networks of compressed air, each consisting of a motor driven air compressor, air dryer and associated air receiver.

At the particular time of the noted violation, PVNGS Unit 1 was in the following configuration:

- The Plant was in MODE 5
- Diesel generator B was inoperable for maintenance.
- Diesel generator A had only one of two air compressors operable due to 13.8 kV bus being de-energized.
- Diesel generator A had one of its two air receivers decreasing in pressure due to the one inoperable air compressor.

The plant was in a degraded mode with one 13.8 kV bus due to the catastrophic failure of a non segregated bus section on 10-29-86. In this configuration, one of the two redundant air compressors for each diesel generator (DG) becomes inoperable since its power supply is from a motor control center powered from the de-energized 13.8 kV bus.

The decision to repressurize the air receiver from the operable compressor was made by the Shift Supervisor who believed that this action was allowed by the Station Manual Procedure 40AC-9ZZ02, "Conduct of Shift Operations" Section 11.3.1. This section allows the Shift Supervisor some discretion as to whether or not written procedures are needed to perform off-normal operations. The Shift Supervisor believed his actions were conservative. This is a judgment call made by the Shift Supervisor. In this case, in the interest of time, the Shift Supervisor judged the temporary modification process or 50.59 review was unnecessary compared to the conservative need to assure that, if called upon, a diesel generator will have the highest potential of starting. The Shift Supervisor was concerned that the degraded bus could not be restored for several days since it had burned up, and that the second air receiver was depressurizing.

I. CORRECTIVE STEPS AND RESULTS ACHIEVED

The administrative procedure for the Conduct of Shift Operations will be revised to ensure the guidance provided to the Shift Supervisor prohibits changing the plant configuration for safety related systems without utilizing the temporary modification process or conducting a 50.59 review unless the change is made to avoid immediate entry into or recovery from a plant emergency as defined in the Emergency Plan, or Emergency Operating and Recovery Procedures.

ATTACHMENT B
(Cont'd)

Response to Notice of Violation 50-528/85-31-06

II. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER ITEMS OF NONCOMPLIANCE

In addition to the corrective actions stated in Section I, training will be provided to the Shift Supervisors on changes made to the procedure.

III. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The procedure changes will be in place by or on April 7, 1986. The training will be provided during the requalification following the implementation of the revised procedure.

ATTACHMENT C

NRC GENERAL AREA OF CONCERN

CONCERN A

Weakness in implementation of the design change process and oversight of the contractor.

RESPONSE

To identify and resolve potential weaknesses in the design change process, a review is being conducted of the contractor design change process relative to the operating plants. In addition, detailed department instructions are being developed and reviewed to allow ANPP organizations to perform more design related work. It is currently planned that ANPP will assume a more direct role in design as PVNGS Unit 3 enters operation. In the interim, to ensure that design changes are correctly processed and contain adequate technical justification, the ANPP Quality Assurance Department will perform reviews of a sample of design changes on a periodic basis for adequacy of technical justification, documentation of the justification, correct processing and implementation. Much of this action was being developed or had been initiated prior to the NRC Team Inspection.

CONCERN B

Review and control of temporary modifications is weak (failure to perform independent verification of the implementation of a temporary modification within the required time frame and poor documentation of technical considerations made in implementing temporary modifications in several instances.)

RESPONSE

The temporary modification administrative control procedure is being revised to strengthen and clarify the requirement of independent verification within the required time frame.

Prior to this inspection, a draft of a new procedure had been prepared to describe a very comprehensive technical input and review process. The new procedure has been approved and has been implemented.

CONCERN C

Accomplish corrective actions on a more timely basis.

RESPONSE

By procedure, Corrective Action Requests contain a response due date. This date is established consistent with the seriousness and complexity of the identified deficiency, but does not normally exceed thirty days. The responsible organization is required to respond within the allocated time period. The response must include, among other things, the action

taken to resolve the discrepancy. If the action has not been completed, the response must contain the schedule for completing corrective action.

Being sensitive to the issue of timeliness of corrective action, ANPP management has reviewed and established objectives for 1986 which include completing corrective action on Correction Action Requests (CAR) within the time period identified in the corrective action response. This approach is designed to ensure corrective action is planned and completed in as short a period of time as possible. Additionally, reports are and have been distributed to management on a monthly basis which indicate both CAR response time and corrective action completion time. These reports allow management at all levels to monitor timeliness of corrective action and become involved where appropriate action is not being taken.

In short, management has been and continues to be concerned with both effectiveness and timeliness of corrective action. Action has been taken to improve the corrective action program and has achieved improvements. Management, at all levels, will continue to be involved in the corrective action program to ensure the program is effectively implemented.

CONCERN D

Non-Licensed Auxiliary Operator training does not measure up to current industry standards.

RESPONSE

ANPP management had previously determined the need to upgrade the non-licensed auxiliary operator training program. As a result, ANPP has committed to INPO accreditation with the submission of the self evaluation report by the end of 1986.

It has been ANPP's position that successful accreditation of the non-licensed auxiliary training program will result in a program that measures up to industry standards.