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Arizona Nuclear Power Project  
P. O. Box 52034  
Phoenix, Arizona 85072-2034

Attention: Mr. E. E. Van Brunt, Jr.  
Executive Vice President

Gentlemen:

The NRC has completed its review of your response to Item 2 of the Notice of Violation, dated October 4, 1985. This item concerned violation of Technical Specification 6.2.2.2 by a member of the engineering staff who worked twenty hours during the twenty-four hour period beginning at 6:00 pm on August 19, 1985, without the required approval or administrative procedures to closely control overtime work.

The NRC has concluded that, in this case, a violation of the Technical Specification 6.2.2.2 did indeed occur. The NRC believes that the intent of this specification is to limit the working hours of unit staff who perform safety-related functions, which include the type of work this engineer performed, namely taking measurements and calculating percent of valve travel during safety-related surveillance testing. The specification is not limited to the examples listed: senior reactor operators, reactor operators, radiation protection technicians, auxiliary operators, and key maintenance personnel. Therefore, the engineer who was involved in the surveillance testing fell under the controls of Technical Specification 6.2.2.2.

Please review your response dated November 5, 1985 to the Notice of Violation, dated October 4, 1985, and revise it as necessary to supply the information required pursuant to the provisions of 10 CFR 2.201: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which were (or will be) taken to avoid further items of noncompliance; and (3) the date when full compliance was (or will be) achieved.

Your cooperation with us is appreciated.

Sincerely,

D. F. Kirsch, Director  
Division of Reactor Safety and Projects

bcc: A. Johnson, RV  
L. Miller, RV  
R. Zimmerman, SRI-PV  
J. Axelrad, IE  
J. Lieberman, ELD  
F. Miraglia, NRR:PWR-B  
E. Licitra, NRR:PWR-B

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