

## Palo Verde 2 2Q/2003 Plant Inspection Findings

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### Initiating Events

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### Mitigating Systems

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### Barrier Integrity

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### Emergency Preparedness

**Significance:**  Sep 26, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to periodically test the ability to meet minimum emergency response facility staffing response times during off-hours.**

IR 05000528-02-04, IR 05000529-02-04, IR 05000530-02-04, IR 72-44/02-02; Arizona Public Service Company; 6/23/02 - 9/21/02; Palo Verde Nuclear Generating Station, Units 1, 2, and 3; Emergency Response Organization Augmentation Testing and Access Control. A noncited violation of very low safety significance was identified for failure to periodically test the ability to meet minimum emergency response facility staffing response times during off-hours. Off-hours exercises are only conducted once every 6 years, and off-hours quarterly pager and autodialer tests conducted over the past year were only functional tests that did not establish response times to the emergency facilities. Failure to adequately test the ability to meet minimum emergency response facility staffing response times during off-hours is a violation of 10 CFR 50.54(q), which requires that a licensee follow their emergency plans. Section 8.1.3, "Drills," of the Emergency Plan states that drills for the emergency organization are conducted periodically throughout the year to test response timing and emergency equipment and to ensure members of the Emergency Response Organization are familiar with their duties. Section 5.1.2.2 of Emergency Plan Implementing Procedure 08 requires that quarterly pager and autodialer testing be conducted to demonstrate minimum staffing response capability for the emergency facilities. Minimum staffing is defined in Table 1 of the Emergency Plan and includes positions and response times during normal and off-hours for each emergency facility. Contrary to the above, drills for the emergency response organization have not tested off-hours response timing periodically throughout the year. The last off-hours facility activation drill was conducted in 1999, and off-hours pager and autodialer tests conducted each quarter did not demonstrate response timing. The finding was determined to be a performance deficiency associated with emergency response organization augmentation testing. The finding was evaluated to be more than minor using the Emergency Preparedness Significance Determination Process because it affects the emergency preparedness cornerstone objective in that inadequate testing of the augmentation function can fail to identify problems in staffing the emergency facilities in a timely manner. The finding was evaluated as having very low safety significance (Green), since it was a failure of a regulatory requirement but not a failure to meet an emergency planning standard. This finding

is in the licensee's corrective action process as Condition Report/Disposition Request 2532635 and is being treated as a noncited violation (50-528/02-04-01; 50-529/02-04-01; 50-530/02-04-01) in accordance with Section VI.A of the NRC Enforcement Policy (Section 1EP3).  
Inspection Report# : [2002004\(pdf\)](#)

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## Occupational Radiation Safety

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### Public Radiation Safety

**Significance:**  Mar 06, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

#### **FAILURE TO PREVENT THE RELEASE OF DETECTABLE AMOUNTS OF LICENSED RADIOACTIVE MATERIAL**

IR 05000528-03-08, IR 05000529-03-08, IR 05000530-03-08, on 2/24/03 - 3/06/30; Arizona Public Service Company; Palo Verde Nuclear Generating Station, Units 1, 2, and 3; Radioactive Material Control; Radiation Safety Team Inspection. The team identified three examples (one NRC identified and two self-revealing) of a noncited violation of Technical Specification 5.4.1.a because the licensee failed to follow procedural requirements. Specifically, the licensee failed to prevent detectable amounts of licensed radioactive material from being unconditionally released from the radiologically controlled area, as required by Procedure 75RP-9RP09, Revision 21, Section 3.2. Unconditionally releasing equipment from the radiologically controlled area with detectable radioactivity was a performance deficiency. The finding was more than minor because it was associated with the cornerstone attribute (material release) and it affected the associated cornerstone objective (to ensure adequate protection of public health and safety from exposure to radioactive materials released into the public domain). The finding involved an occurrence in the radiological material control program that was contrary to licensee procedures. When processed through the Public Safety Significance Determination Process, the finding was found to have very low safety significance because the finding was a radioactive material control issue, was not a transportation issue, public exposure was not greater than 5 millirem, and there were less than five occurrences.

Inspection Report# : [2003008\(pdf\)](#)

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### Physical Protection

**Significance:** N/A Jan 17, 2003

Identified By: NRC

Item Type: FIN Finding

#### **Verification of compliance with Interim Compensatory Measures Order**

On February 25, 2002, the NRC imposed by Order, Interim Compensatory Measures to enhance physical security. The inspectors determined that, overall, the licensee appropriately incorporated the Interim Compensatory Measures into the site protective strategy and access authorization program; developed and implemented relevant procedures; ensured that the emergency plan could be implemented; and established and effectively coordinated interface agreements with offsite organizations.

Inspection Report# : [2003006\(pdf\)](#)

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 **Significance:** Sep 26, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to mark a portion of a document as containing Safeguards information.**

IR 05000528-02-04, IR 05000529-02-04, IR 05000530-02-04, IR 72-44/02-02; Arizona Public Service Company; 6/23/02 - 9/21/02; Palo Verde Nuclear Generating Station, Units 1, 2, and 3; Emergency Response Organization Augmentation Testing and Access Control. A noncited violation of very low safety significance was identified for failure to mark a portion of a document as containing Safeguards information. On September 18, 2001, pursuant to 10 CFR 50.90, the licensee submitted to NRC Headquarters a change to its physical security plan. A portion (page) of this plan change included the size (number) of the armed response force used to defend all three units at Palo Verde and was not marked as containing "Safeguards Information." 10 CFR 73.21 requires, in part, that information regarding the size (number) of responding security forces be marked "Safeguards Information" in a conspicuous manner to indicate the presence of protected information. Following identification of this issue, the licensee withdrew all copies of this physical security plan change. The failure to conspicuously mark a portion of a document as "Safeguards Information" was determined to be a performance deficiency. The finding was evaluated to be more than minor because it affects a physical protection cornerstone objective and if left uncorrected it would become a more significant safety concern. Using the Physical Protection Significance Determination Process, the inspector determined the violation had very low safety significance because there were not more than two similar findings in four calendar quarters. Because of the very low safety significance (Green) and because the licensee included the finding in their corrective action program as Condition Report/Disposition Request 2433526, this finding is being treated as a noncited violation (50-528/02-04-02; 50-529/02-04-02; 50-530/02-04-02) in accordance with Section VI.A of the NRC Enforcement Policy (Section 3PP2).  
Inspection Report# : [2002004\(pdf\)](#)

 **Significance:** Sep 26, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to mark a drawing as containing Safeguards information.**

IR 05000528-02-04, IR 05000529-02-04, IR 05000530-02-04, IR 72-44/02-02; Arizona Public Service Company; 6/23/02 - 9/21/02; Palo Verde Nuclear Generating Station, Units 1, 2, and 3; Emergency Response Organization Augmentation Testing and Access Control. A noncited violation of very low safety significance was identified for failure to mark a drawing as containing Safeguards information. On June 27, 2002, the licensee maintained Drawing TY-GL-002 (sheet 1 of 1), which contained an overview block diagram of the Palo Verde new North Access Facility and the new Independent Spent Fuel Storage Installation (ISFSI) and was not marked as containing "Safeguards Information." 10 CFR 73.21 requires, in part, that information regarding the site-specific drawings that substantially represent the final design features of the physical protection system be marked "Safeguards Information" in a conspicuous manner to indicate the presence of protected information. Following identification of this issue, the licensee ensured that all copies of the drawing were properly marked. The failure to conspicuously mark the drawing as "Safeguards Information" was determined to be a performance deficiency. The finding was evaluated to be more than minor because it affects a physical protection cornerstone objective and if left uncorrected it would become a more significant safety concern. Using the Physical Protection Significance Determination Process, the inspector determined the violation had very low safety significance because there were not more than two similar findings in four calendar quarters. Because of the very low safety significance (Green) and because the licensee included the finding in their corrective action program as Condition Report/Disposition Request 2533054, this finding is being treated as a noncited violation (50-528/02-04-03; 50-529/02-04-03; 50-530/02-04-03) in accordance with Section VI.A of the NRC Enforcement Policy (Section 3PP2).  
Inspection Report# : [2002004\(pdf\)](#)

## Miscellaneous

Last modified : September 04, 2003