

## Palo Verde 3 3Q/2003 Plant Inspection Findings

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### Initiating Events

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### Mitigating Systems

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### Barrier Integrity

**Significance:**  Oct 15, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Inadequate Procedure Used During Loss of Letdown Event**

IR 05000528-02-06, IR 05000529-02-06, IR 05000530-02-06, on 9/22/02 - 12/28/02, Arizona Public Service Company; Palo Verde Nuclear Generating Station, Units 1, 2, and 3; personnel performance during nonroutine evolutions and event followup.

A noncited violation of 10 CFR 50.59 and Technical Specification 5.4.1(a) was identified for failing to perform a required safety evaluation and for inappropriately revising Procedure 40AO-9ZZ05, "Loss of Letdown," Revision 9, in February 1996.

Procedure 40AO-9ZZ05 was revised to direct operators to allow charging to increase pressurizer level from 55 percent to 70 percent based on a calculation that assumed the plant was tripped. As a result, the procedure was inadequate for operation at 100 percent power in that the procedure directed operators to allow charging to increase pressurizer level above the Technical Specification limit on pressurizer level in MODES 1, 2, and 3 of 56 percent. When the procedure was used at 100 percent power on October 15, 2002, the probability or likelihood of malfunction of the pressurizer safety valves, equipment previously evaluated in the safety analysis report, increased.

The violation was of more than minor safety significance because the inadequate procedure placed the plant in a condition that increased the likelihood that a loss of heat removal accident would cause reactor coolant to pass through the pressurizer safety valves thus causing damage to these valves. The finding is of very low safety significance because of the short duration of the condition and availability of mitigating system components. This violation is being treated as a noncited violation consistent with Section VI.A of the NRC Enforcement Policy. This issue was entered into the licensee's corrective action program as Condition Report/Disposition Requests 2560477 and 2580246 (Section 1R14).

Inspection Report# : [2002006\(pdf\)](#)

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## Emergency Preparedness

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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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## Miscellaneous

Last modified : December 01, 2003