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Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
U. S. Nuclear Regulatory Commission
Mail Station: T-6 D59
Washington, DC 20555-0001

Dear David L. Meyer:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Public Comment on the First Year of Initial Implementation of the
Reactor Oversight Process (ROP)**

In response to the Federal Register Notice dated December 14, 2000 (pages 78215-78217), Arizona Public Service Company (APS) submits the following recommendations for potential discussion topic areas during the March 26, 2001 public ROP workshop. APS also forwards an endorsement of the comments provided by the Nuclear Energy Institute (NEI).

Performance Indicators

- Unavailability – definition differences (NEI 99-02, INPO/WANO, and Maintenance Rule), fault exposure, treatment of support system unavailability, engineering analyses of degraded systems, structures, and components (differences between Technical Specification operability and availability), and thresholds.
- RCS leakage – data from on-line monitors that continuously record parameters used to determine RCS leakage verses the credited periodic Surveillance Test data.
- Occupational Exposure – improving performance as indicated by the PI in some cases has the unintended consequence of reducing the effective use of ALARA tools.
- Protected Area Security Equipment – consistency across different plant designs.
- Fitness-For-Duty (FFD) – clarification of source data (i.e. there are no regulatory required “prompt notification” for an FFD program failure.)

Template = ADM-013

E-RIDS = ADM-03

Adm = A. Spector (AK5)

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- Data accuracy – change report requirements should be tied to the significance of the change (i.e. too many resources are spent seeking absolute perfection in the accuracy of the PI data – 10 minutes of uncounted unavailability in a quarter takes a lot of resources to find and correct but in reality has no affect on the PI results.)

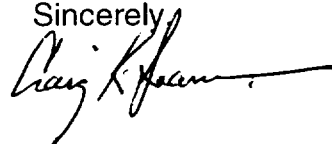
Significant Determination Process

- Reactor Safety – consistency in using the SDP and engaging the licensees in the process to the extent that licensees have the opportunity to understand the assumptions and path used to determine the significance of a finding.

Inspections

- Problem Identification and Resolution – redundancy in that multiple inspectors on different inspections are asking for and inspecting the same condition reports.
- Scope – the sample size in some inspection plans is too large – notably the Plant Modification, Problem Identification and Resolution, and Fire Protection Triennial inspections. This has been an unnecessary burden to both the NRC inspectors and the licensees.

Should you have any questions, please contact Craig Seaman at (623) 393-5421.

Sincerely,


CKS/DLK/kg

cc: E. W. Merschhoff
J. N. Donohew
J. H. Moorman