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 RECIP. NAME: RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director m/4

SUBJECT: Discusses sys reviews for various facility sys. Requests NRC schedule sys reviews supporting licensing schedule. Requests meeting in Bethesda, MD to resolve facility & CESSAR-F sys review issues.

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October 21, 1980
ANPP-16579 - EEVBjr/JMA

Dr. H. R. Denton, Director
Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Palo Verde Nuclear Generating
Station (PVNGS) System Review

Re: Palo Verde Nuclear Generating Station
(PVNGS) Units 1, 2 and 3
Docket Nos. STN-50-528/529/530

Dear Dr. Denton:

As you are aware, Arizona Public Service Company (APS) has been proceeding with the concept of System Reviews for various PVNGS systems and programs. This was undertaken because we mutually felt that this concept would speed up the licensing process for PVNGS.

To date, we have performed System Reviews on the Class IE DC System on May 8 in Phoenix; the Class IE AC System on July 9 in Bethesda; the Auxiliary Feedwater System on August 21 and 22 in Phoenix, and the Class IE Qualification Program on September 25 and 26 in Phoenix. In addition, in our October 14 letter to you, we closed out the open items on the Class IE DC System.

We originally had the Fire Protection System scheduled for a System Review on November 5, 1980, however, at NRC's request, we postponed this review. We then scheduled the Balance-of-Plant Instrumentation and Control System for a System Review on November 5, 1980, however, we have now been requested by NRC to delay this review and not to schedule any further System Reviews until after January 1, 1981. Also, we had intended to schedule a System Review for the Control Room after the first of the year.

Since the original intent of the System Review concept was to speed up the licensing process on PVNGS, we are becoming increasingly concerned that the delaying of our System Reviews will cause an associated delay in our licensing schedule and greatly affect our mutual workloads and planning. We believe

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Dr. H. R. Denton, Director
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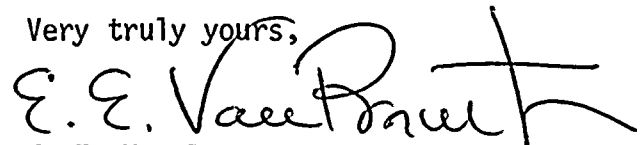
that it is imperative that a schedule be set up within NRC for the PVNGS System Reviews which will support our licensing schedule and allow both the NRC and APS to plan for the System Reviews. In addition, we request that you provide us with a list of other systems/programs on which you request System Reviews be performed to accelerate our licensing process.

In addition, the question of including CESSAR-F system in System Reviews continues to surface. Our understanding at the time we proceeded with the System Review concept was that System Reviews would be limited to those systems not covered in CESSAR-F and that all CESSAR-F scope systems would be handled on the CESSAR-F docket in the spirit of standardization. We feel the scope of systems to be covered in the APS System Reviews must be resolved and believe CESSAR-F systems should be handled under the CESSAR-F docket.

We believe the System Review concept is a viable and expeditious alternative to dedicated reviews. However, for it to be finally successful, there must be a clear understanding of the systems/programs to be reviewed and a dedication to agreed upon schedules.

We request a meeting be held in Bethesda as soon as possible to resolve these issues.

Very truly yours,



E. E. Van Brunt, Jr.
APS Vice President,
Nuclear Projects
ANPP Project Director

EEVBJr/JMA/av

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