

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8109290336 DOC. DATE: 81/09/21 NOTARIZED: YES DOCKET # 05000528  
 FACIL: STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Public  
 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Public 05000529  
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Public 05000530  
 AUTH. NAME: AUTHOR AFFILIATION  
 VAN BRUNT, E. E. Arizona Public Service Co.  
 RECIP. NAME: RECIPIENT AFFILIATION  
 TEDESCO, R. C. Assistant Director for Licensing.

SUBJECT: Forwards marked-up responses to NRC 810909 questions re  
 radiation protection open items. Two oversize drawings encl.  
 Aperture cards will be available in PDR.

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	CHEM ENG BR 11	1	1	CONT SYS BR 09	1	1
	CORE PERF BR 10	1	1	EFF TR SYS BR 12	1	1
	EQUIP. QUAL BR 13	3	3	GEOSCIENCES 28	2	2
	HUM FACT ENG 40	1	1	HYD/GEO. BR 30	2	2
	I&C SYS BR 16	1	1	I&E 06	3	3
	IE/EPDB 35	1	1	IE/EPLB 36	3	3
	LIC GUID BR 33	1	1	LIC QUAL BR 32	1	1
	MATL ENG BR 17	1	1	MECH ENG BR 18	1	1
	MPA 1	1	0	OELD 1	1	0
	OP LIC BR 34	1	1	POWER SYS BR 19	1	1
	PROC/TST REV 20	1	1	QA BR 21	1	1
	RADI ASSESS BR 22	1	1	REAC SYS BR 23	1	1
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	STRUCT ENG BR 25	1	1			
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OCT 01 1981

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ARIZONA



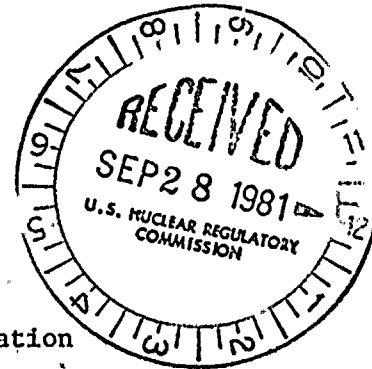
PUBLIC SERVICE COMPANY

STA. \_\_\_\_\_

P.O. BOX 21666 - PHOENIX, ARIZONA 85036

September 21, 1981  
ANPP-18960-JMA/KWG

Mr. R. L. Tedesco  
Assistant Director for Licensing  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555



Subject: Palo Verde Nuclear Generating Station  
(PVNGS) Units 1, 2, and 3  
Docket Nos. STN-50-528/529/530  
File: 81-056-026, G.1.10

Reference: Letter From R. L. Tedesco to E. E. Van Brunt, Jr.,  
Dated September 9, 1981; Subject: Comments on  
Responses to Radiation Protection Open Items.

Dear Mr. Tedesco:

Please find attached a copy of our responses to the questions on  
radiation protection in the referenced letter.

If you have any questions, please contact me or my staff.

Very truly yours,

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

EEVB Jr/KWG/bj

Attachment

cc: J. Kerrigan (w/a)  
P. Hourihan (w/a)  
A. C. Gehr. (w/a)

Boo!  
3  
111

8109290336 810921  
PDR ADDCK 05000528  
A PDR



STATE OF ARIZONA )  
 ) ss.  
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President Nuclear Projects of Arizona Public Service Company, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority so to do, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true.

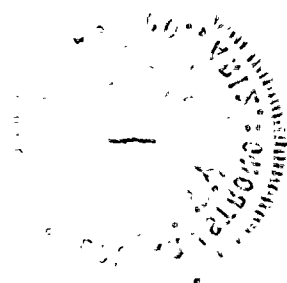
Edwin E. Van Brunt, Jr.  
Edwin E. Van Brunt, Jr.

Sworn to before me this 25<sup>th</sup> day of September, 1981.

Connie Lou Armstrong  
Notary Public

My Commission expires:

June 24, 1983



NRC QUESTION 471.6

Figures 13.1-6 and 7 should be revised to show that radiation protection section is a separate organization.

PVNGS RESPONSE

See revised PVNGS FSAR figures 13.1-6 and 13.1-7, Attachment A.

Y. 12. 10. 1924. 1. 1924

Y. 12. 10. 1924. 1. 1924  
Y. 12. 10. 1924. 1. 1924



# Attachment A

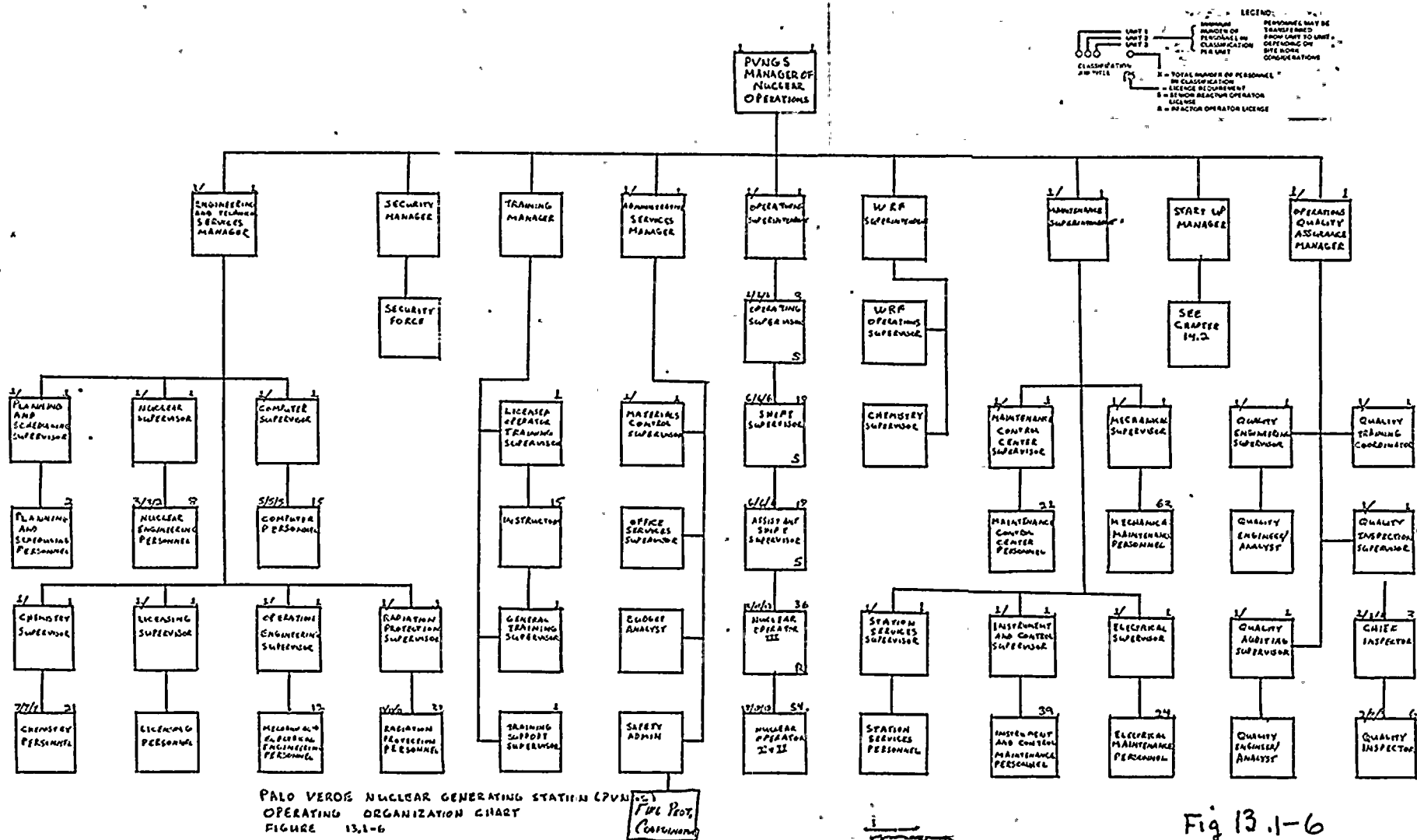


Fig 13.1-6



POSITION		PRESENT NUMBER OF EMPLOYEES	YEAR AND QUARTER																MINIMUM NUMBER OF EMPLOYEES												
			1979				1980				1981				1982					1983				1984				1985			
			1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4		1	2	3	4	1	2	3	4				
NUCLEAR NUCLEAR  																															



**Palo Verde Nuclear Generating Station  
FSAR**

**MANNING SCHEDULE**  
**Figure 13.1-7**



NRC QUESTION 471.2

Section 13.1.3.1 does not specify the minimum requirements for the supervising radiation physicist (who is the RPM backup). Section 13.1.2.2.2 specified the minimum requirements.

PVNGS RESPONSE

See revised PVNGS FSAR page 13.1-24 presenting the requested information, Attachment B.



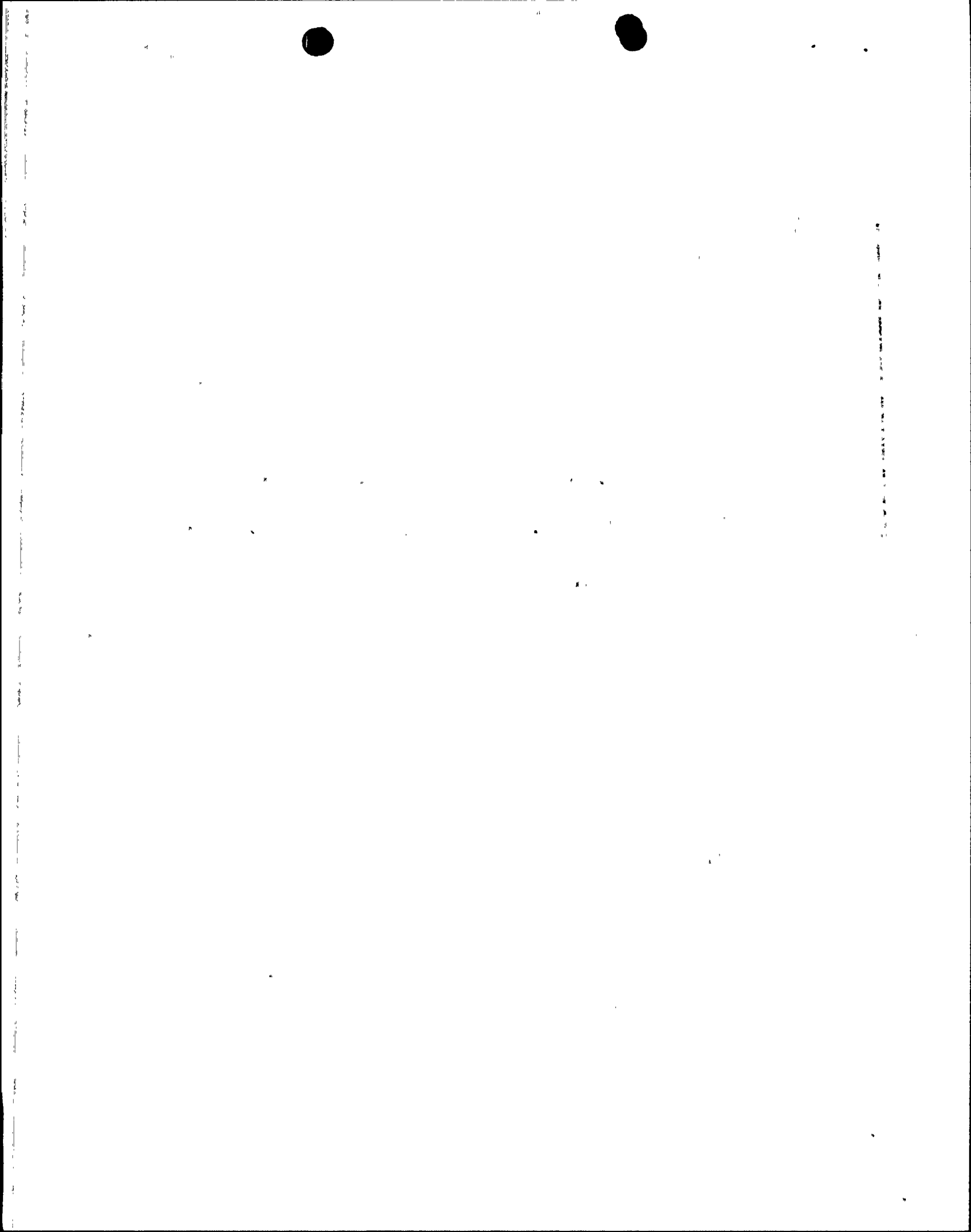
ORGANIZATIONAL STRUCTURE  
OF APPLICANT

- c. The Operating Supervisor shall have a minimum of 6 years experience, of which a minimum of 2 years shall be nuclear power experience.

13.1.3.2 Qualifications of Plant Personnel

Resumes of the initial appointees to key plant managerial and supervisory positions through the Shift Supervisor level are included in appendix 13B.

- d. The Supervising Radiation Physicist shall have a minimum of five years of experience, of which two years shall be at a professional level.





NRC QUESTION 471.3a

NUREG 0737, Sec. II.B.2 does not state that: "personnel radiation exposures in vital areas, during post-accident activities will meet the criteria of NUREG 0737 and GDC-19 design basis".

PVNGS RESPONSE

See revised PVNGS LLIR, page II.B.2, providing the requested information, Attachment C.

1. The first part of the document is a list of the names of the persons who were present at the meeting.

2. The second part of the document is a list of the names of the persons who were present at the meeting.

3. The third part of the document is a list of the names of the persons who were present at the meeting.

PVNGS Evaluation

As part of the PVNGS design process before the incident at TMI-2, the shielding of areas that require personnel access for accident mitigation (such as the control room) was reviewed to determine that access would not be unduly limited. For maintenance actions, this review principally considered shielding separation between redundant ESF components to ensure that repairs to a failed component would not be unduly restricted by radiation from an operating component. In addition, as noted in FSAR Section 3.11, safety related equipment is qualified for the maximum expected radiation dose.

1 | An analysis of the PVNGS shielding design was performed to determine if TMI level source strengths would inhibit maintenance access or violate 10 CFR 50, Appendix A, General Design Criterion 19 (GDC 19). The analysis <sup>reviewed</sup> ~~will also review~~ equipment qualification dose limits in accordance with Commission Order and Memorandum CLI-80-21 and NUREG 0588.

~ INSERT A ~

A. Source Terms

1 | Initial core releases used in the analyses are equivalent to those recommended in Regulatory Guides 1.4 and 1.7 and Standard Review Plan 15.6.5 and considered two LOCA events. The first was a LOCA with recirculation accomplished via the containment sump. The second was a LOCA with an intact primary with recirculation accomplished via the shutdown

INSERT A to II.B.2-2

The review demonstrated that personnel radiation exposures in vital areas during post-accident activities will meet the criteria of NUREG 0737 and GDC-19 design basis.



NRC QUESTION 471.3 (b)

NUREG-0737, Item II.F.1.3 - The location of the containment high-range monitors should be specified.

PVNGS RESPONSE

Locations of these monitors are provided on Attachments D and E.  
The containment area high range monitors are numbered RE148 and RE149.

3 2.3.1 10 2 10 100



PALO VERDE NUCLEAR GENERATING STATION UNITS 1, 2 & 3  
DRAWING CHANGE NOTICE (DCN)  
JOB NO. 10407

UNIT	ASSIGNEE *		
A	C	S	O
①	C	⑤	O
②	⑥	S	O
③	⑥	S	O

CIRCLE APPLICABLE UNIT(S) AND ASSIGNEE  
\* C - CONSTRUCTION, S - STARTUP, O - OWNER

DRAWING NO.	SHEET NO.	REV.	DCN NO.
13-J-ZCF-013		1	3

JOB NO. 10407 PAGE 1 OF 2

DATE: 8/11/81 BY: J.L. HUNT-CONTRACTOR

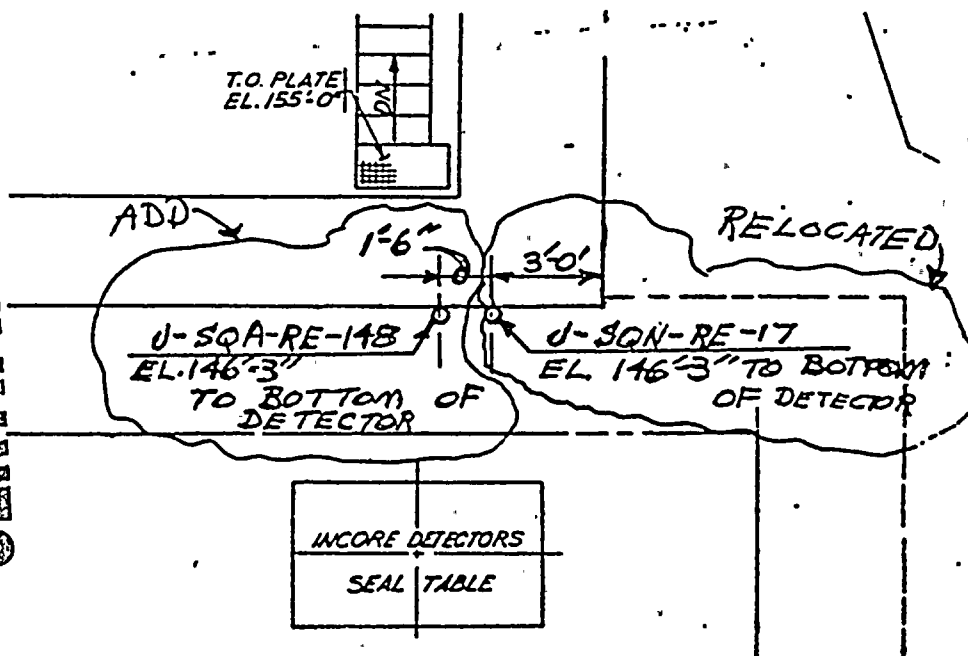
CHANGE REQUESTED BY: ☐ CLIENT ☒ ENGINEERING ☐ FIELD ☐ SUPPLIER/CONTRACTOR

REASON FOR CHANGE: ADDITIONAL RADIATION DETECTOR REQUIRED BY  
NU REG 1.97 & RELOCATED DETECTOR TO CORRECT

DESCRIPTION OF CHANGE VIEWING FIELD.

ADD RE-148 & RELOCATE RE-17 AS SHOWN.

CERTIFIED DRAWING



8-18-81

MATERIAL PROCUREMENT RESPONSIBILITY

☒ BECHTEL OFFICE ☐ SUPPLIER/CONTRACTOR  
☐ BECHTEL FIELD ☐ NONE REQUIRED

AFFECTED PURCHASE ORDERS

NM-997

PM OR MR PREPARED FOR DCN CHANGE

YES NO

✓

by K. Sotomayor  
GROUP SUPERVISOR

8-11-81  
DATE

by J. Hester  
NUCLEAR GROUP SUPERVISOR (IF REQUIRED)

8/14/81  
DATE

J. Alley  
PROJECT ENGINEER

8/11/81  
DATE

POAE (O-LISTED PAID'S AND SINGLE LINE DWGS)

DATE

REMARKS TMI TASK #10

ADDITIONAL DISTRIBUTION:

☐ PROJECT PROCUREMENT MANAGER

☐ COST TREND ENGINEER







PALO VERDE  
NUCLEAR GENERATING STATION  
UNITS 1, 2 & 3  
DRAWING CHANGE NOTICE  
(DCN)  
CONTINUATION PAGE

DCN NUMBER			
DRAWING NO.	SHEET NO.	REV.	DCN NO.
13-J-ZCF-014		0	2

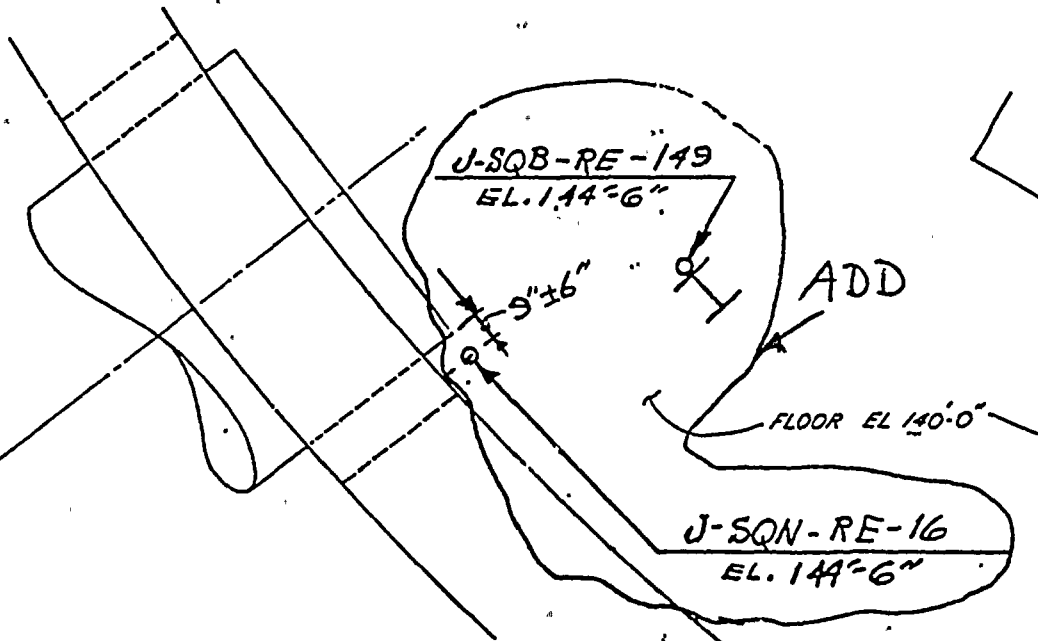
JOB NO. 10407 PAGE 2 OF 2

DATE: 8/11/81 BY: J.L. HUNT-CONTROLS

DESCRIPTION OF CHANGE

ADD RE-16 (EXISTING) & RE-149 AS SHOWN

CERTIFIED DRAWING





NRC QUESTIONS 471.3 (c)

NUREG-0737, Item III.D.3.3 - Does not state that a minimum of three portable airborne iodine samplers will be available on the site.

PVNGS RESPONSE

See revised PVNGS LLIR, page III.D.3.3.-1, with the requested information, Attachment F.

Y 3, 1.2 05 9 2010 11

### III.D.3.3 IMPROVED INPLANT IODINE INSTRUMENTATION UNDER ACCIDENT CONDITIONS

#### Position

- (1) Each licensee shall provide equipment and associated training and procedures for accurately determining the airborne iodine concentration in areas within the facility where plant personnel may be present during an accident.
- (2) Each applicant for a fuel-loading license to be issued prior to January 1, 1981 shall provide the equipment, training, and procedures necessary to accurately determine the presence of airborne radioiodine in areas within the plant where plant personnel may be present during an accident.

#### PVNGS Evaluation

Prior to fuel load, procedures will be developed for determining airborne iodine concentration. <sup>Silver Zeolite or</sup> Charcoal cartridges will be used in conjunction with a portable pump or a fixed vacuum system. ↓ The cartridges will be removed to the counting laboratory for gamma spectrum analysis. Procedures will also define ALARA concepts for removal, transport, and analysis.

PVNGS response to this item is included in the evaluation of section II.F.1 requirements.



INSERT A TO PAGE III.D.3.3-1

A minimum of three portable air samplers will be available onsite.





NRC QUESTION 471.16

- (a) The minimum requirements for station personnel described in Section 13.1.2 are keyed to ANSI N18.1-71 as follows:  
Insert A, Page 13.1-22, wording for (Note d), for supervising radiation physicist is not included.
- (b) Amended Section 13.1.2.3 does not show the number of radiation protection technicians assigned to each unit. The original number (6) of radiation protection technicians should be increased and Section 13.1.2.3 and Figure 13.1.6 should be revised accordingly.

PVNGS RESPONSE

See PVNGS FSAR pages 13.1-20, 21, 22 and 23, Attachment G.

8.1.72 02 1 011 07

8.1.72

ORGANIZATIONAL STRUCTURE  
OF APPLICANT

The Training Director is responsible to the Support Services Manager for the preparation, coordination, and conduct of the station training program. He directs the activities of the Simulator Supervisor and the nuclear plant instructors.

13.1.2.3 Operating Shift Crews

An operating crew for each unit will normally consist of a Shift Supervisor <sup>and Assistant Shift Supervisor (both of whom will possess Senior Reactor Operator licenses)</sup>, ~~two Nuclear Operator III's (who will possess a license)~~, a Shift Foreman, and a Control Operator <sup>(both of whom will possess Reactor Operator licenses)</sup> ~~and four Nuclear Operator I's and/or II's~~. The minimum shift crew composition for various modes of operation is shown in table 13.1-2.

During refueling operations, when the reactor core configuration is being altered, a Senior Reactor Operator or a Senior Reactor Operator Limited to Fuel Handling will directly supervise the fuel handling activities and will have no other concurrent duties.

At least one member of each shift operating crew will be trained in the station radiation protection procedures and will be capable of performing routine or special radiation surveys using portable radiation detectors, use of protective barriers and signs, use of protective clothing and breathing apparatus, performance of contamination surveys, check on radiation monitors, and limits of exposure rates and accumulated dose.

The Shift Supervisor is responsible for implementing the radiation protection program in the absence of the Radiation Protection Foreman (refer to section 12.1.1.2).

INSERT 13.1D

INSERT 13.1 D

" A qualified Radiation Protection Technician shall be assigned to each shift in each unit with fuel loaded in the reactor.

During refueling operations or when numerous radiation protection activities are in progress, additional radiation protection technicians will be assigned and supervision provided, as needed.



ORGANIZATIONAL STRUCTURE  
OF APPLICANT

Table 13.1-2  
MINIMUM SHIFT CREW COMPOSITION (a)  
(FOR EACH UNIT)

License Category	Applicable Modes (b)	
	1, 2, 3 & 4 <sup>(e)</sup>	5 & 6
SOP (SRO)	1/2 (c)	1 (c), d)
OP (RO)	2	1
Non-Licensed	2	1

a. Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of this table.

b. Operational modes are as defined in the Technical Specifications.

c. Does not include the licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling, supervising Core Alterations.

↑ INSERT 13.1E

### 13.1.3 QUALIFICATIONS OF NUCLEAR PLANT PERSONNEL

#### 13.1.3.1 Qualification Requirements

The recommendations of Regulatory Guide 1.8, Personnel Selection and Training, are used as the basis for establishing minimum qualifications for nuclear power plant personnel.





...INSERT 13.1 E.

- " (C) At least one of the unit senior reactor operators on site and on shift will be a shift supervisor. At least one senior reactor operator will be in the unit control room during mode 1 through 4 operations for each unit, HOWEVER, THIS REQUIREMENT will not prevent brief absences to allow response to in plant conditions.
- ... (d) Does not include the licensed senior reactor operator or senior reactor operator limited to fuel handling, supervising core alterations. A licensed senior operator is required to directly supervise any core alteration activity.
- ... (e) A shift technical advisor shall be on site and on shift (available within 10 minutes) whenever one or more units are operating in modes 1 through 4. "

ORGANIZATIONAL STRUCTURE  
OF APPLICANT

The minimum requirements for station personnel described in section 13.1.2 are keyed to ANSI <sup>ANS 3.1-1978</sup> ~~N18.1-1971~~ as follows:

<u>Position</u>	<u>ANSI N18.1-1971 Position</u> <u>(Paragraph No.)</u>
Plant Manager	Plant Managers (4.2.1)
Assistant Plant Manager	Plant Managers (4.2.1)
Engineering and Technical Services Superintendent	Technical Manager (4.2.4)
Nuclear Supervisor	Reactor Engineering & Physics (4.4.1)
Radiological and Chemistry Supervisor	Radiation Protection Manager, (Note a)
Support Services Manager	Supervisor not requiring AEC license (4.3.2)
Maintenance Superintendent	Maintenance Manager (4.2.3)
Operations Superintendent	Operations Manager (4.2.2), no license
Scheduling and Licensing Supervisor	Supervisor not requiring AEC license (4.3.2)
Operations Engineer- ing Supervisor	Supervisor not requiring AEC license (4.3.2)
Computer Supervisor	Supervisor not requiring AEC license. (4.3.2)
Station Services Supervisor	Supervisor not requiring AEC license (4.3.2)
Electrical Supervisor	Supervisor not requiring AEC license (4.3.2)
Quality Supervisor	Note b
Training Supervisor	Supervisor not requiring AEC license (4.3.2)

↑  
INSERT

A



INSERT A

Attachment G

3.1-1978

ANS: Position  
(Paragraph No.)

<u>Position</u>	<u>Position</u> (Paragraph No.)
Manager of Nuclear Operations	Plant Manager (4.2.1)
Engineering and Technical Services Manager	Technical Manager (4.2.4)
Nuclear Supervisor	Reactor Engineering & Physics (4.4.1)
Licensing Supervisor	Supervisor not requiring AEC License (4.3.2)
Operations Engineering Supervisor	Supervisor not requiring AEC License (4.3.2)
Chemistry Supervisor	Radiochemistry (4.4.3)
Radiation Protection Supervisor	Radiation Protection Manager (Note a)
Supervising Radiation Physicist	Radiation Protection (4.4.4) (Note d)
Maintenance Superintendent	Maintenance Manager (4.2.3)
Maintenance Control Center Supervisor	Supervisor not requiring AEC License (4.3.2)
Instrumentation and Control Supervisor	Instrumentation and Control (4.4.2)
<i>PLANT INSTRUMENT AND CONTROL TECHNICAL</i> Station Services Supervisor	<i>REPAIRMAN (4.5.3)</i> Supervisor not requiring AEC License (4.3.2)
Mechanical Supervisor	Supervisor not requiring AEC License (4.3.2)
<i>PLANT MECHANICAL</i> Electrical Supervisor	<i>REPAIRMAN (4.5.3)</i> Supervisor not requiring AEC License (4.3.2)
<i>PLANT ELECTRICIAN</i> Administrative Services Manager	<i>REPAIRMAN (4.5.3)</i> Supervisor not requiring AEC License (4.3.2)
Operations Superintendent	Operations Manager (4.2.2) No License
Operating Supervisor	Supervisor Requiring AEC License (4.3.1) (Note c)
Shift Supervisor	Supervisor Requiring AEC License (4.3.1)
Assistant Shift Supervisor	<i>Supervisor Requiring AEC License</i> Operators-(Licensed)-(4.5.1)
Nuclear Operator III	Operators (Licensed) (4.5.1)
Nuclear Operator I & II	Operator (Not Licensed) (4.5.1)
Operations Quality Assurance Manager	(Note b)
Training Manager	Supervisor not requiring AEC License (4.3.2)
Security Manager	Supervisor not requiring AEC License (4.3.2)

ORGANIZATIONAL STRUCTURE  
OF APPLICANT

<u>Position</u>	<u>ANSI N18.1-1971 Position</u> <u>(Paragraph No.)</u>
Mechanical Supervisor	Supervisor not requiring AEC license (4.3.2)
Chemistry Supervisor	Radiochemistry (4.4.3)
Radiation Protection Supervisor	Radiation Protection (4.4.4)
Instrumentation and Control Supervisor	Instrumentation and Control (4.4.2)
Operating Supervisor	Supervisor Requiring AEC License (4.3.1) (Note c)
Shift Supervisor	Supervisor Requiring AEC License (4.3.1)
Assistant Shift Supervisor	Operators (Licensed) (4.5.1)
Nuclear Operator (licensed)	Operators (Licensed) (4.5.1)
Nuclear Operator (not licensed)	Operator (Not Licensed) (4.5.1)
Plant Mechanic	Repairman (4.5.3)
Plant Electrician	Repairman (4.5.3)
Plant Instrumentation and Control Technician	Repairman (4.5.3)

## NOTES:

- Radiation Protection*
- The Radiological-and-Chemistry Supervisor will meet the recommendations of the regulatory position of Regulatory Guide 1.8 for the Radiation Protection Manager.
  - The Operations Quality Assurance Manager shall have at least 6 years experience in the field of quality assurance. At least 6 months of the 6 years shall be in nuclear quality assurance. A minimum of 2 years of the 6 years shall be related technical or academic training.



NRC QUESTION 471.17

The revised resume of radiation protection supervisor (Mr. McDuffee) should be provided.

PVNGS RESPONSE

Mr. McDuffee's resume is provided, Attachment H.

## STATION PERSONNEL RESUME

J. W. McDuffee

Radiation Protection Supervisor

PVNGS

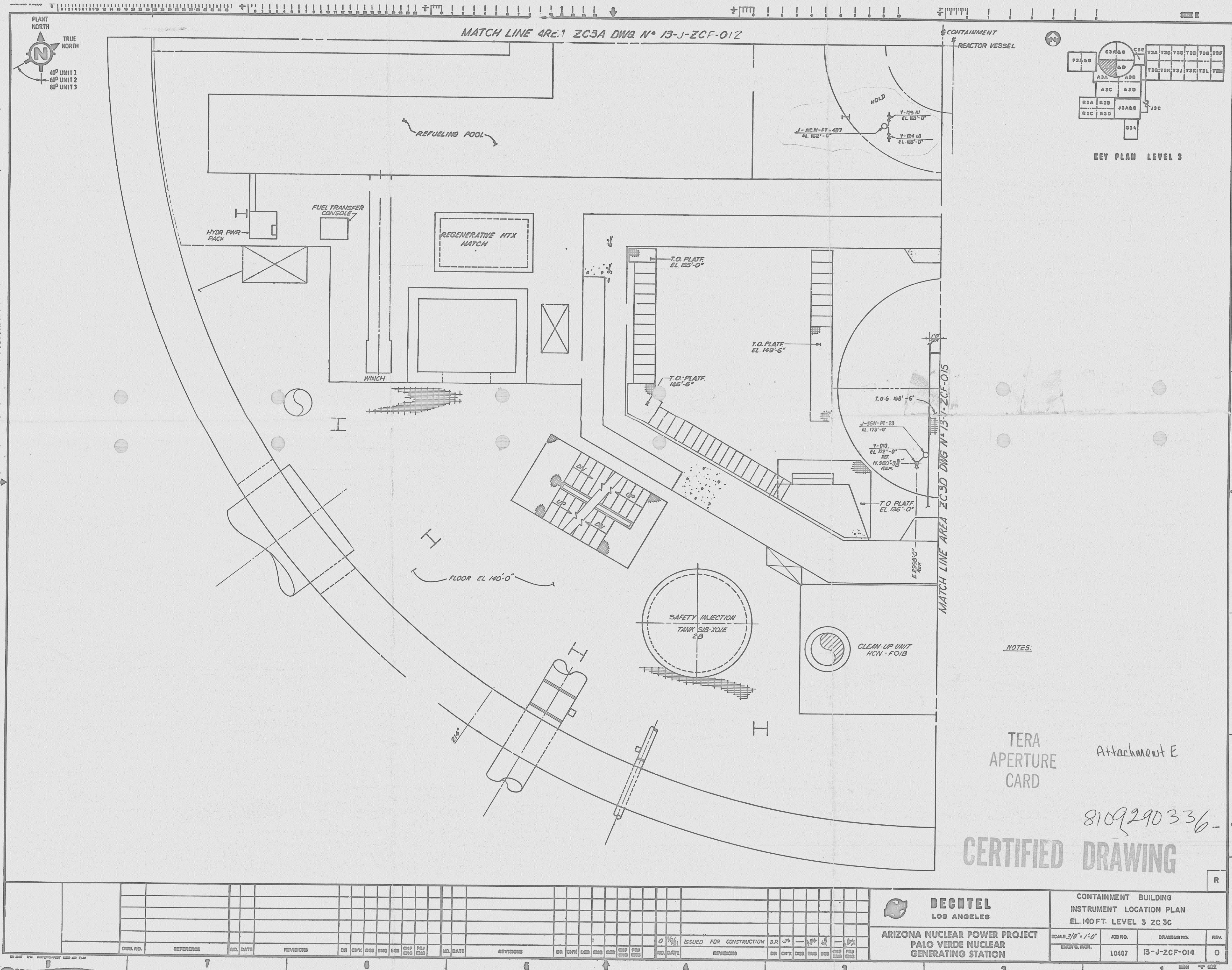
Educational Background	Professional Level Experience
Phoenix College 1960-1961	U.S. Navy Nuclear Operator
Nuclear Power Plant Operators Course Fort Belvoir, VA 1966-1967	SM1, Nuclear Power Plant, Fort Belvoir, VA 1967
Radionuclide Analysis by Gamma Spectroscopy, Montgomery, AL 1967	Shift Supervisor PM-3A Nuclear Power Plant 1968
Accelerator Radiation Protection, Rockville, MD 1969	Radiation Protection Supervisor Armed Forces Radiological Research Institute 1969-1970
Internal Dosimetry for Fixed Nuclear Facilities, Oak Ridge, Tennessee	Supervisor Operational Health Physics Counting Laboratory Armed Forces Radiological Research Institute 1971
	Radiation Health Section Leader Submarine Tender 1971-1974
	Arizona Public Service Company Radiation Protection Super- visor 1978-Present



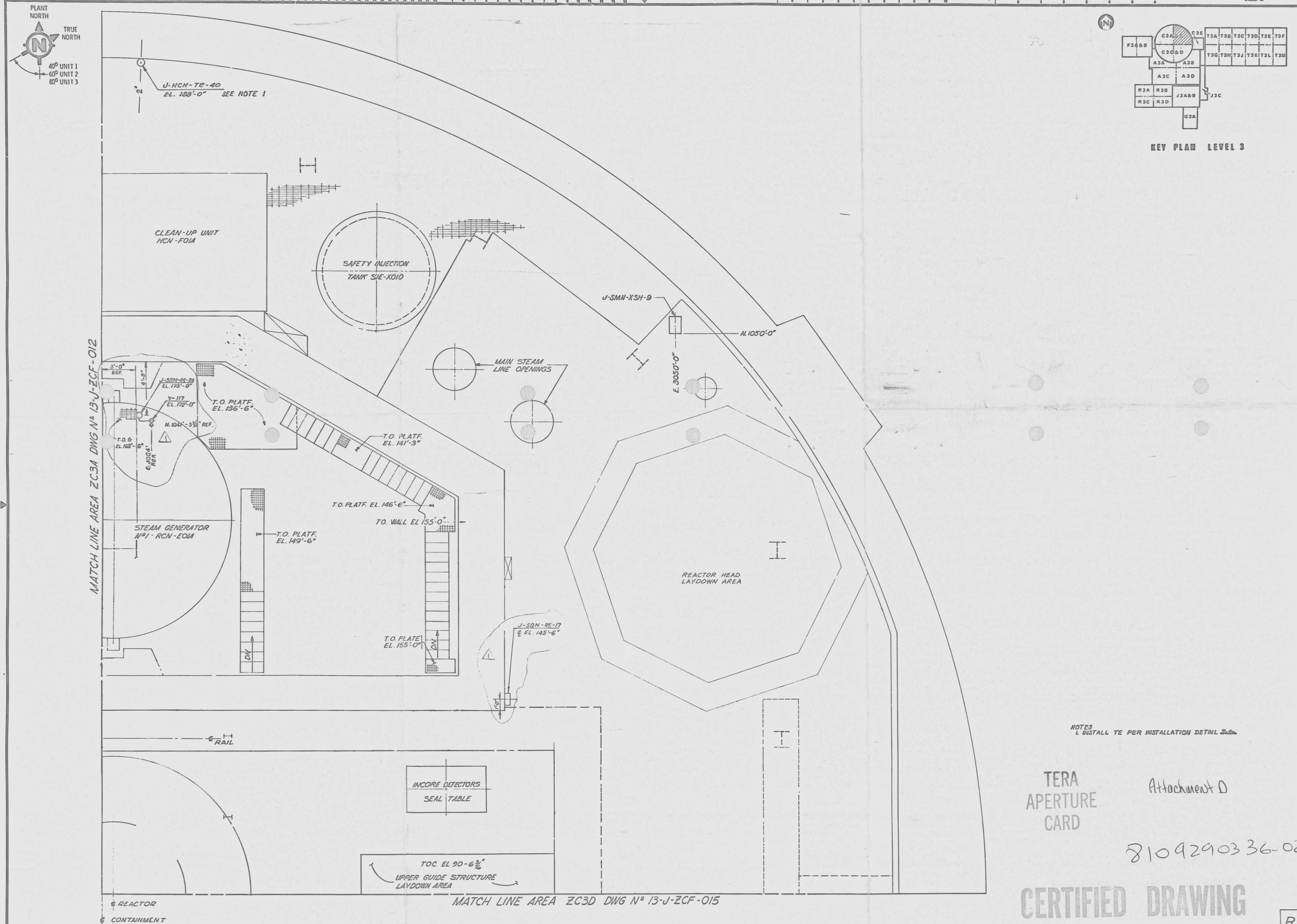




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