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 VAN BRUNT, E.E. Arizona Public Service Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
 TEDESCO, R.L. Assistant Director for Licensing

SUBJECT: Requests clarification of items discussed in NRC 820511
 status report on control room design review per NUREG-0700.
 Agreed verification of similarity between plant simulator
 & control rooms necessary.

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ARIZONA NUCLEAR POWER PROJECT
Post Office Box 21666 Phoenix, Arizona 85036

JUN 17 1982 P2:07
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June 16, 1982
ANPP-21205 -ECS/GAS

Mr. R. L. Tedesco
Assistant Director of 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: 82-056-026; G.1.10

Ref: (1) NRC Letter from Frank J. Miraglia, NRC to E. E.
Van Brunt, Jr., May 11, 1982, Subject: Status
Report on the Control Room Design Review of
Palo Verde.

(2) ANPP-19666, December 10, 1981

Dear Mr. Tedesco:

Reference (1) has been reviewed for accuracy with the understanding that the reference (1) document will be used by your staff in auditing the implementation of approved corrective actions on the agreed upon schedules. Review of reference (1) has indicated that the following items be clarified.

The Human Engineering Discrepancies (HED) and their proposed corrective actions on reference (1) are being presented by Arizona Public Service (APS) to your staff for their review and approval as the Detailed Control Room Design Review (DCRDR) required by NUREG-0660, May 1980 and NUREG-0737, November 1980 and not as a Preliminary Design Assessment (PDA), as stated on reference (1). The DCRDR performed by APS, using NUREG CR-1580 as a guideline and reviewed against NUREG-0700, identifies all HEDs at the PVNGS simulator, which is of similar design to each of the plant's control rooms. HEDs identified by the Human Factors Engineering Branch (HFEB) review team during their audit at PVNGS have also been factored into the APS DCRDR. Except for the committed to actions to finish the current study, APS will not be performing another CRDR post-OL since the current study meets the requirements of NUREG-700.

Reference (1) under its discussion section fails to mention that the NRC audit team verified the design similarity between the plant's simulator and the plant's control rooms as stated in the SER. Agreed verification of this similarity between the plant's simulator and plant's control rooms is necessary since the APS DCRDR is based on the fact that the plant's simulator is of similar design to the plant's control rooms.

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A PDR

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Appendix F of reference (1) needs to be clarified as follows. Presently Appendix F states that APS will review items B-4.0.1 and B-4.0.2 as part of the DCRDR (NUREG-0700) and provide the results of its evaluation to your staff. As stated in a previous paragraph of this letter, APS has performed its DCRDR and submitted its results to your staff, therefore items B-4.0.1 and B-4.0.2 need to be listed under Appendix B of reference (1). Under Appendix B these two items will be reviewed further using guidance provided in NUREG-0700. Proposed solutions and implementation schedules for these items will be submitted to your staff for approval 120 days prior to issuance of an operating license.

Clarification needs to be made with respect to the following items in Appendix B of reference (1):

B-4.0.1	B-6.0.1(a)
B-5.0.2	B-6.0.1(b)
B-5.0.3	B-7.0.1
B-5.0.4	B-7.0.2
B-5.0.5	B-7.0.4
B-5.0.6	B-7.0.7
B-5.0.7	B-7.0.8
B-5.0.8	B-7.0.9
B-5.0.15	B-8.0.1

The listed items will not be further reviewed using the guidance provided in NUREG-0700 as presently stated. The listed items will be reviewed per reference (2) attachment, Item 17, "The following items will be reviewed and the results of this review, proposed solutions and an implementation schedule will be provided to the NRC for their review and approval 120 days prior to licensing."

If you have any questions, please contact Guillermo Sanchez at (602) 271-3566.

Very truly yours,

E. E. Van Brunt

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

EEVBJr/GAS/br

cc: E. Licitra (NRC)
L. Bernabei, Esq.
A. C. Gehr

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STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, A. Carter Rogers, represent that I am Nuclear Engineering Manager of Arizona Public Service Company, that the foregoing document has been signed by me for Edwin E. Van Brunt, Jr., Vice President Nuclear Projects, 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 behalf, the statements made therein are true.

A. Carter Rogers

A. Carter Rogers

Sworn to before me this 16th day of June, 1982

John B. Ureyatt
Notary Public

NOTARY
PUBLIC
My Commission expires:

March 11, 1986

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