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 FACIL: STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Public 05000528
 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
 KNIGHTON, G. Licensing Branch 3

SUBJECT: Forwards revised responses to NRC 830727 request for addl info re util. proposed rev to FSAR Section 1.8 concerning exceptions to Reg Guide 1.88 to permit use of records storage facility w/level concrete floor & roof.

DISTRIBUTION CODE: B001S COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6
 TITLE: Licensing Submittal: PSAR/FSAR Amdts & Related Correspondence

NOTES: Standardized plant. 05000528
 Standardized plant. 05000529
 Standardized plant. 05000530

RECIPIENT ID CODE/NAME	COPIES LTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTR ENCL
NRR/DL/ADL	1 0	NRR LB3 BC	1 0
NRR LB3 LA	1 0	LICITRA, E. 01	1 1
INTERNAL: ELD/HDS3	1 0	IE FILE	1 1
IE/DEPER/EPB 36	3 3	IE/DEPER/IRB 35	1 1
IE/DEQA/QAB 21	1 1	NRR/DE/AEAB	1 0
NRR/DE/CEB 11	1 1	NRR/DE/EHEB	1 1
NRR/DE/eqb 13	2 2	NRR/DE/GB 28	2 2
NRR/DE/MEB 18	1 1	NRR/DE/MTEB 17	1 1
NRR/DE/SAB 24	1 1	NRR/DE/SGEB 25	1 1
NRR/DHFS/HFEB 40	1 1	NRR/DHFS/LQB 32	1 1
NRR/DHFS/PSRB	1 1	NRR/DL/SSPB	1 0
NRR/DSI/AEB 26	1 1	NRR/DSI/ASB	1 1
NRR/DSI/CPB 10	1 1	NRR/DSI/CSB 09	1 1
NRR/DSI/ICSB 16	1 1	NRR/DSI/METB 12	1 1
NRR/DSI/PSB 19	1 1	NRR/DSI/RAB 22	1 1
NRR/DSI/RSB 23	1 1	REG FILE 04	1 1
RGNS	3 3	RM/DDAMI/MIB	1 0

EXTERNAL: ACRS	41	6	6	BNL (AMDTS ONLY)	1	1
DMB/DSS (AMDTS)	1	1	1	FEMA-REP DIV 39	1	1
LPDR	03	1	1	NRC PDR 02	1	1
NSIC	05	1	1	NTIS	1	1

1. The following information was received from the Bureau of the Census, Washington, D.C., on 10/10/68:

ՔՆՆՆՆՆՆՆՆ	ՀԱՅԿԱՆԻՍՏԱՆԻ ՀԱՆՐԱՊԵՏՈՒԹՅԱՆ ԿՐԹԱԳՐԱԴԱՐԱՆԻ ՎԵՐԿԱՆՈՒՄԻ
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ՔՆՆՆՆՆՆՆՆ	ՀԱՅԿԱՆԻՍՏԱՆԻ ՀԱՆՐԱՊԵՏՈՒԹՅԱՆ ԿՐԹԱԳՐԱԴԱՐԱՆԻ ՎԵՐԿԱՆՈՒՄԻ

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Arizona Public Service Company

P.O. BOX 21666 • PHOENIX, ARIZONA 85036

October 17, 1983
ANPP-28013 - WFQ/JYM

Director of Nuclear Reactor Regulation
Attention: Mr. George Knighton, Chief
Licensing Branch No. 3
Division of Licensing
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: 83-056-026; G.1.01.10

Reference: (A) Letter from E. E. Van Brunt, APS, to D. M. Sternberg, NRC
Region V, ANPP-24169, dated June 24, 1983.
(B) Letter from W. F. Haass, NRC, to G. W. Knighton, NRC,
dated July 27, 1983.

Dear Mr. Knighton:

A proposed revision to PVNGS FSAR Section 1.8 concerning exceptions to
Regulatory Guide 1.88 was submitted in Reference (A). Reference (B)
provided the results of your review of Reference (A) requesting
additional information .

Attached are the revised responses.

If you have any questions concerning this matter, please contact me.

Very truly yours,

E. E. Van Brunt

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

EEVB/JYM/sp
Attachment

cc: E. A. Licitra (w/a)
A. C. Gehr "
J. Spraul "

Boo!

8310210252 831017
PDR ADOCK 05000528
PDR

October 17, 1983
ANPP-28013 - WFQ/JYM

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, A. Carter Rogers, represent that I am Manager, 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 to do so, 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.

A. Carter Rogers
A. Carter Rogers

Sworn to before me this 17th day of October, 1983.

Norah Meador
Notary Public

My Commission Expires:

My Commission Expires April 6, 1987



10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

PROPOSED CHANGE TO
PVNGS FSAR
SECTION 1.8

I. DESCRIPTION OF CHANGE

This proposed revision provides the following changes to the Applicant's position with respect to Regulatory Guide 1.88:

- A. clarifies the commitment to comply with ANSI N45.2.9-1974 by eliminating reference to NFPA-232,
- B. allows level concrete floor and roof in the records storage facility.
- C. changes the fire rating of doors, structure and frames, and hardware to conform with the minimum fire rating requirements of NQA-1.

II. REASON FOR CHANGE

- A. Position 2 of Regulatory Guide 1.88 states that NFPA-232 provides an acceptable alternative to the fire protection provisions listed in Subdivision 5.6 of ANSI N45.2.9-1974. Section 1.8 of the FSAR currently includes conformance with NFPA-232. To relieve some confusion that was caused by the current position, this proposed revision deletes the commitment to conform with NFPA-232 and more clearly describes conformance with ANSI N45.2.9-1974.
- B. An exception is necessary to allow usage of a records storage facility with level concrete floor and roof. The facility is located on the first floor of a two-story building with basement. The building has provisions for adequate drainage. In addition, the facility uses a halon fire suppression system (no liquid) which makes provisions for drainage unnecessary. No piping or other source of water is located within the records storage facility.

III. BASIS FOR ACCEPTABILITY OF CHANGE

- A. Criterion XVII, "Quality Assurance Records", of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants", to 10CFR Part 50, "Licensing of Production and Utilization Facilities", requires, in part, that, consistent with applicable regulatory requirements, the applicant establish requirements concerning record retention, such as duration, location, and assigned responsibility.

The revised Quality Assurance Program incorporating this change continues to describe the established requirements concerning record retention, location and assigned responsibility.

- B. ANSI N45.2.9-1974 provides general requirements and guidelines for the collection, storage, and maintenance of quality assurance records associated with the design, manufacture, construction, and operation phase activities of nuclear power plants. It is not intended to cover the preparation of the records, nor to include working documents not yet designated as quality assurance records. The requirements are intended to assure that records are available when needed for their intended purpose.

The revised Quality Assurance Program continues to satisfy the intent of ANSI N45.2.9-1974 by providing reasonable protection against possible destruction or deterioration of records.

IV. CLARIFICATION OF HOW WE COMPLY WITH RG 1.88

Establishment of a records turnover period is necessary since the Regulatory Guide and the endorsed standard do not prescribe the maximum acceptable interval for transferring records to the permanent storage facility. The records turnover period is as follows:

Upon Operating License (OL) issuance, originators of PVNGS documentation are required to turn over their records to the Nuclear Project Records Management Program (NPRM) within 120 days of completion for records retention and retrieval per prescribed NPRM procedures. Upon acceptance, NPRM will process and microfilm all incoming turnover of documentation within 90 days.

Records generated prior to OL issuance will be transferred to APS and stored in compliance with RG 1.88 within 24 months after the records are completed.

Establishment of a method for the control of records removed from storage is necessary, since ANSI N45.2.9 1974, Section 5.3, item 5 requires that storage procedures include rules governing access to and control of files. The control of records removed from storage is as follows:

- 1) Records may be checked out for no more than 5 working days.
- 2) When unattended, the records shall be locked in a file cabinet with a one-hour rating within a building with fire protection (e.g. sprinklers, halon, or CO₂.)

Insert "A" to FSAR Page 1.8-59

Following exceptions to Section 5.6 of ANSI N45.2.9-1974:

- A. Doors, structure and frames, and hardware shall be designed to comply with the requirements of a minimum two-hour fire rating (Section 4.4.1 (c)) of Supplement 17S-1 of NQA-1 requires two-hour rated doors and dampers and the latest version of Regulatory Guide 1.28 (3/25/83) provides no additional guidance in this area.
- B. Vinyl-asbestos tile is used on the floor in lieu of a surface sealant.
- C. The concrete floor and roof of record storage facilities are not provided with slope for drainage (Halon suppression is provided making drainage unnecessary. No piping or other source of water is located within the records storage facility. The facility is located on the first floor of a two-story building with basement, having provisions for adequate drainage.)

