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AUTH.NAME AUTHOR AFFILIATION
VAN BRUNT,E.E. Arizona Public Service Co.
RECIP.NAME RECIPIENT AFFILIATION
KNIGHTON,G. Licensing Branch 3

SUBJECT: Forwards response to NRC 840605 comments re emergency procedure generation package.Steps to verify adequate instruments & controls available for operator to perform assigned task incorporated into validation procedure.

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NOTES:Standardized plant. 05000528
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Arizona Public Service Company

ANPP-30093-EEVBJr/MAJ
August 1, 1984

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: 84-056-026; G.1.01.10

Reference:
(1) Letter from G. W. Knighton, NRC, to E. E. Van Brunt, Jr., APS, dated June 5, 1984. Subject: Procedure Generation Package (PGP) for Palo Verde.
(2) Generic Letter 83-23 dated July 29, 1983. Safety Evaluation of "Emergency Procedure Guidelines" for Combustion Engineering PWR's.
(3) Letter from E. E. Van Brunt, Jr., APS, to G. W. Knighton, NRC, dated July 15, 1983 (ANPP-27309). Subject: Submittal of PVNGS Procedure Generation Package.

Dear Mr. Knighton:

Reference (1) identified 3 comments from the NRC's review of the PVNGS PGP to be resolved. Attached is the APS response to these comments.

If you have any questions, please call me.

Very truly yours,

E. E. Van Brunt

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

EEVBJr/MAJ/mb
Attachment

A003
1/1

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ANPP-30093

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President, Nuclear Production, 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.

Edwin E. Van Brunt

Edwin E. Van Brunt, Jr.

Sworn to before me this 1st day of August, 1984.

Nora E. Meador

Notary Public

My Commission Expires:

My Commission Expires April 6, 1987

RESPONSE TO NRC COMMENTS ON THE PVNGS PROCEDURE GENERATION PACKAGE

NRC Comment (1)

In your submittal, you state that the control room staff can implement the EOP's for any unusual condition that occurs in the plant during any mode of operation. However, the CEOG generic emergency procedure guidelines do not cover conditions other than off-normal events which require a reactor trip from power operation. Therefore, we require that you provide confirmatory information documenting the technical bases for extending the Palo Verde plant specific guidelines to all operating modes.

Response:

The APS Procedure Generation Package submittal, dated July 15, 1983, had extended PVNGS Emergency Procedures to be applicable to all plant modes. It was the position of APS that the various setpoints for safety systems (Safety Injection, Main Steam Isolation, and Containment Isolation) would provide indication of an event in all plant modes. Safety system actuation would alert the operator to a problem and aid in diagnosis of the event.

Since the July 15, 1983 submittal of the PVNGS Procedure Generation Package, the NRC has issued Generic Letter 83-23, Safety Evaluation of "Emergency Procedure Guidelines" for all Combustion Engineering (CE) Pressurized Water Reactors. Long term item 4.3(5), "Coverage of Conditions which occur at other than Power Operations," of Generic Letter 83-23, identifies the need to expand the Emergency Procedure Guidelines to cover conditions other than reactor trip and power operations.

APS will remove the deviation in the PGP, extending the EOP's to any mode of operation, and will participate with the CE Owners Group in resolution of the "any mode" concern. APS will upgrade the EOP's when resolution of this issue is finalized.

NRC Comment (2)

Our evaluation of the CEOG generic guidelines identified open issues. We will require that you appropriately update the Palo Verde plant-specific guidelines and EOP's to reflect any changes made to the CEOG generic guidelines as a result of resolving those open issues.

Response:

APS will upgrade the PVNGS Emergency Procedures upon NRC approval of the revised CEOG guidelines. The schedule for plant specific activities to upgrade the PVNGS Emergency Procedures is given in Figure 1. The implementation of the upgraded EOP's will be based upon a refueling schedule. This will require NRC approval of the revised guidelines eight (8) months prior to a PVNGS refueling outage.

NRC Comment (3)

The validation and verification programs in the Palo Verde PGP did not clearly address how the programs would evaluate the adequacy of the existing instrumentation and controls since operator information and control requirements were not addressed. In response to this discrepancy (which also relates to our review of the task analysis process for the Palo Verde Detailed Control Room Design Review), by letter dated April 9, 1984, you provided a description on how operator information and control requirements were identified. This information is currently under staff review. You will be advised of the results after the review is complete.

Response:

The PVNGS validation procedure incorporates a step to verify adequate instruments and controls are available for the operator to perform the assigned task. This methodology provides an independent second check of the control room design. This action adequately addresses the concern of ensuring the operator has the needed indications and controls.

NRC APPROVAL OF REVISED GUIDELINES

APS PLANT SPECIFIC ACTIVITIES FOR REVISING EMERGENCY PROCEDURES

1 2 3 4 5 6 7 8 Refueling Outage

Review of Revised Guidelines (1 month)

Revised Plant Specific Technical Guidelines (1 month)

Revise Plant Emergency Procedures (1 month)

Verify Revised Procedures (1 month)

Validate Revised Procedures (1 month)

Incorporate NRC Comments (1 month)

8 months for Procedure Upgrade
3 months for Training

11 months for Implementing

Revised Procedures Reviewed By Plant Review Board (1 month)

Revised Procedures to Training for Lesson Plan Upgrade (3 months)

Training Upgraded Procedures (3 months)

NRC REVIEW OF REVISED PLANT SPECIFIC TECHNICAL GUIDELINES (3 months)