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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 FSAR changes, to revising response to Questions
 13A,17 & 13A,39 to reflect current program for conducting
 position task analysis. Response to 13A,39 revised to clarify
 individual qualifications.

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THE UNITED STATES OF AMERICA
 DEPARTMENT OF THE ARMY
 OFFICE OF THE CHIEF OF STAFF
 WASHINGTON, D. C. 20315
 MEMORANDUM FOR THE RECORD
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Arizona Public Service Company

October 2, 1984
ANPP-30701 EEVBJr/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: Revised Responses to FSAR 13A.17 and 13A.39
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: Letter from E. E. Van Brunt, Jr., APS to
G. W. Knighton, NRC, ANPP 30184 dated August 13, 1984

Dear Mr. Knighton:

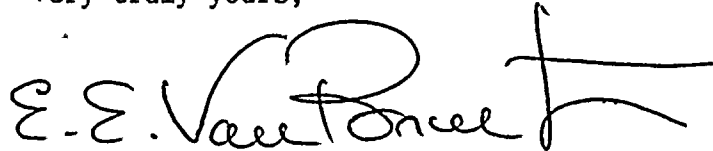
Attached are FSAR changes to revise Questions 13A.17 and 13A.39.

The attached response to Question 13A.17 supersedes the response provided in reference a). The response has been updated to reflect the current program for conducting a position task analysis.

The response to 13A.39 has been revised to clarify what criteria and factor an individual must satisfy, on a case by case evaluation of an individual's qualifications, to direct or supervise the conduct of individual (Phase II through IV) tests.

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

Very truly yours,



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

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A PDR

EEVBJr/JYM/bg
Attachments

cc: E. A. Licitra w/a
A. C. Gehr w/a
A. Zwetzig w/a
R. Zimmerman w/a

Boo!
1/1

Page 2

ANPP-

Mr. G. Knighton

PVNGS FSAR

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S. Shepherd

(All with attachments)



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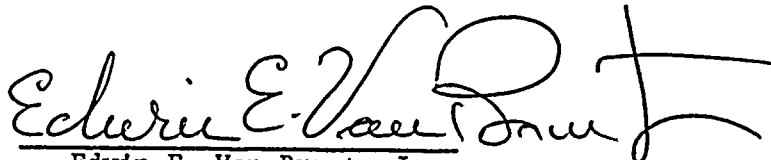
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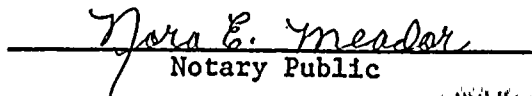
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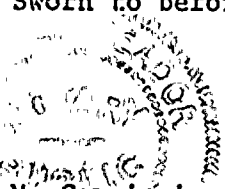
STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

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, Jr.

Sworn to before me this 2nd day of October, 1984.


Notary Public


My Commission Expires:

My Commission Expires April 6, 1987



design changes, project document updates and general status of the project and serve as training methods.

These meetings are also used to instruct personnel within their department on safety-related systems of the plant that relate directly to them. Corporate correspondence classes are also available for instruction in nuclear and other engineering-related fields at APS:

All offsite training programs will be developed by the respective departments to meet their specific needs.

QUESTION 13A.17 (NRC I&E Question 12)

Please describe the program that has been completed, or your plans for conducting a position task analysis or equivalent program for all personnel regularly assigned to PVNGS which provides a basis for defining the needed training and, thus, provides assurance that assigned tasks can be effectively carried out. In addition, please state when this program was or will be completed.

INSERT RESPONSE: The INPO (Institute for Nuclear Power Operations) organization is performing generic position task analyses for nuclear power plant personnel. It is our intention to adapt these generic position task analyses to fit the positions at PVNGS. This task shall commence at the time we receive the INPO documents and be completed within one year. We understand INPO's present scheduled date to publish the generic position task analyses is in early 1982.

QUESTION 13A.18 (NRC I&E Question 13)

(13.2)

Please furnish the duration of the normal training/retraining course(s) and the organization providing the training for the following employee groups identified in the FSAR:

- a. Non-Licensed Supervisors (Section 13.2.1.1.5)
- b. Maintenance Personnel (Section 13.2.1.1.6)

Revised Response to Question 13A.17

Insert A

The plans for conducting a position job task analysis are as follows:

Usable job task analyses are becoming available over a protracted period of time and are being received later than originally anticipated by APS.

As interim measures to assure that needed training is adequately provided, the following actions have been taken:

INPO training guidelines in Operations and Maintenance areas have been used as guidance in developing the appropriate training. In addition, a job task analysis developed for another utility of similar NSSS design has been used as a basis for training development in Mechanical, Electrical and I&C Maintenance disciplines.

Systematic development of training has become a prerequisite to accreditation of training programs through INPO and includes a task analysis process. PVNGS is currently validating job task analysis for operators obtained through INPO. Any necessary revisions to training programs to operators should be complete in the fourth quarter of 1984. The goal for completing INPO accreditation for all programs is 2 years after start-up of Unit 1.

QUESTION 13A.38

Please supply the correct reference in paragraph 14.2.2.12.1.A.3. The indicated paragraphs do not exist.

RESPONSE: Refer to revised section 14.2.2.12.1.A.3.

QUESTION 13A.39

Please define the factors to be considered and acceptance criteria to be used in performing the case-by-case qualification of otherwise unqualified startup personnel as described in Section 14.2.2.12.1.B.3.

RESPONSE: Listed below are ~~factors and criteria that are~~ *criteria items (1) and (2) and the factor*
~~item (3) that are~~ considered by the Director of Nuclear Operations for a
 case-by-case evaluation of an individual's qualifications
 to direct or supervise the conduct of individual Phase II
 through Phase IV tests. The individual must satisfy ~~one~~
~~of the three criteria.~~ *the following criteria and factor:*

- (1) Amount of experience that the individual has with the equipment and instrumentation involved in the individual test or equivalent equipment and instrumentation. Three months of experience ~~will be~~ ^{is} required.
- (2) Completion of specific training on the performance of the individual test. A walk-through in the field or in the simulator, directed by an individual who is qualified per 14.2.2.12.1.B.1 or 14.2.2.12.1.B.2, ~~will be~~ ^{is} required.
- (3) Nature of the individual test. Individuals will be considered for qualification under 14.2.2.12.1.B.3 for tests which are performed under normal plant operating conditions. For any test which initiates a

plant transient or puts the plant in an unusual operating condition, the individual who directs or supervises the test will be qualified to the requirements of 14.2.2.12.1.B.1 or 14.2.2.12.1.B.2.

QUESTION 13A.40

Please supply information concerning the duties, responsibilities and qualifications of the Operations Support Superintendent shown in Figure 13.1-6 reporting to the Operations Manager.

RESPONSE: This position is a Supervisor, not a Superintendent. Refer to revised section 13.1.2.2.3.1.6. For qualifications, refer to revised section 13.1.3.1.

QUESTION 13A.41

Please provide the information requested in question 7 for the Day Shift Supervisor shown in Figure 13.1-6 reporting to the Unit 2 (sic) Operations Superintendent(s). Also, please clarify whether the Day Shift Supervisor is a staff or line position.

RESPONSE: Refer to revised section 13.1.2.2.3.1.1. This is a line position. For qualifications, refer to revised section 13.1.3.1.

QUESTION 13A.42

Please identify the organization staffed with qualified inspectors of safety-related maintenance, and show the relationship of this organization to those of the Director of Nuclear Operations, the PVNGS Operations QA/QC Manager and the Corporate Quality Assurance Manager.

RESPONSE: The Corporate Quality Assurance Manager has the overall responsibility for inspection of safety-related maintenance. The Quality Control Manager and the Quality

