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

SUBJECT: Forwards proposed change to FSAR Section 1.8 re
 clarifications to ANSI N18.7 endorsed by Reg Guide 1.33.
 Change made for consistency between FSAR,CEN-152,Rev 1 &
 facility emergency operating procedures.

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EXTERNAL: ACRS 41	6 6	BNL (AMDTs ONLY)	1 1
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LPDR 03	1 1	NRC PDR 02	1 1
NSIC 05	1 1	NTIS	1 1

The following information was obtained from the records of the
 Department of the Interior, Bureau of Land Management, on the
 subject of the land owned by the United States in the
 State of California, and the same is hereby published for the
 information of the public.

The following is a list of the land owned by the United States
 in the State of California, and the same is hereby published for the
 information of the public.

The following is a list of the land owned by the United States
 in the State of California, and the same is hereby published for the
 information of the public.

Section	Range	County	Acres	Owner
1	1	Alameda	100	United States
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Arizona Public Service Company

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

October 15, 1984
ANPP-30840 TFQ/JYM

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Docket Nos. STN-50-528/529/530
Exception to R. G. 1.33
File: 84-056-026; G.1.01.10

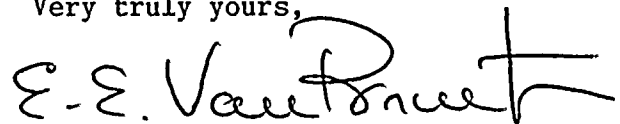
Dear Mr. Knighton:

Attached is a proposed change to Section 1.8 of the FSAR concerning clarifications to ANSI N18.7 which is endorsed by Regulatory Guide 1.33.

The change was made for consistency between the FSAR, CEN-152, Rev. 1, (CE Emergency Procedure Guidelines), and the PVNGS Emergency Operating Procedures.

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

Very truly yours,



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

EEVBJr/JYM/bg
Attachment


cc:
E. A. Licitra w/a
A. C. Gehr w/a

8410170241 841015
PDR ADOCK 05000528
A PDR

Bood
11

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 15 day of October, 1984.



Notary Public

My Commission Expires:

My Commission Expires April 6, 1987



Delta-ferrite content of procedure qualification welds is determined by chemical analysis in accordance with ASME Code, Section III, Division 1, 1974 Edition, Paragraph NB-2433 instead of by magnetic measurement devices called for in Paragraph C.1.

Since austenitic stainless steel welding materials are controlled to deposit 8 to 25% delta-ferrite based on chemistry, except for 309 and 309L welding materials, which are controlled to deposit 5 to 15% delta-ferrite based on chemistry, magnetic measurement of production welds required by Paragraph C.1 is not necessary to assure satisfactory delta-ferrite content.

REGULATORY GUIDE 1.32: Use of IEEE STD 308-1971, Criteria for Class IE Electrical Systems for Nuclear Power Generating Stations (Revision 0, August 11, 1972)

RESPONSE

The position of Regulatory Guide 1.32 is accepted (refer to section 8.3.1). In addition, for a discussion of compliance with IEEE STD 308-1974, refer to section 8.3.

REGULATORY GUIDE 1.33: Quality Assurance Program Requirements (Operation) (Revision 2, February 1978)

RESPONSE

The position of Regulatory Guide 1.33 is accepted with the following exception to Position C.2:

4 | The APS commitment refers to Regulatory Guides, and revisions thereof, specifically identified in this FSAR.

The following exception is taken to Section 3.4.2 of the referenced standard ANSI N18.7:

The APS commitment on the qualification of personnel who are performing preoperational and startup test functions is found in section 14.2.2.12.

In addition, the following interpretations of the referenced standard ANSI N18.7 are made:

A. Section 5.2.2:

The requirements of this section are accepted with the following interpretations:

Temporary changes to procedures may be made provided the change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator License on the unit affected.

~~Procedural steps for which actions should be committed to memory are the immediate actions of the emergency procedures.~~ *INSERT. 2*

B. Section 5.2.13.1:

The requirement that changes made to procurement documents be subject to the same degree of control as was used in the preparation of the original documents is applied consistent with the requirements of ANSI N45.2.11, Paragraph 7.2. Minor changes to documents, such as inconsequential editorial corrections or changes to commercial terms and conditions, may not require that the revised document receive the same review and approval as the original documents.

C. Section 5.2.17:

The requirements of this section are accepted with the following interpretation:

The requirement that deviations, their cause, and any corrective action completed or planned shall be



3.
2.

INSERT 2

Procedural steps traditionally identified as immediate actions are incorporated into standard post trip actions. These actions are identified as safety functions that ensure plant safety regardless of accident classification. Safety functions, in the form of flow charts, will be provided on the control boards for ready use by the operators following any reactor trip.

4 | documented shall apply to significant deviations.
Other identified deviations will be documented and
corrected. This interpretation is consistent with
Appendix B to 10CFR50, Criterion XVI, Corrective Action.

The implementation of the positions of this Regulatory Guide
are described in chapters 13, 16, and 17.

D. Section 5.3.9.1
[INSERT 3]

INSERT 3

The requirements of this section are accepted with the following interpretation:

Actions identified as immediate operator actions have been standardized in the form of safety functions. Safety functions are maintained for all transients when the emergency procedure is implemented. This ensures proper operator response independent of event diagnosis. This approach is consistent with CEN-152, CE Emergency Procedure Guidelines.

Actions identified as subsequent operator actions are addressed as a recovery procedure, implemented after event diagnosis. This approach is consistent with CEN-152, CE Emergency Procedure Guidelines.

The specific procedure format and content has been identified in the Emergency Procedure Generation Package and submitted to the NRC for review. This is consistent with NUREG 0899.



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