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RECIP.NAME RECIPIENT AFFILIATION
KNIGHTON,G. Licensing Branch 3

SUBJECT: Forwards proposed change to FSAR SEction 1.8 re exception to ANSI Std N45.2.4 which is endorsed by Reg Guide 1.30. Computer info mgt sys to maintain plant equipment calibr tatus meets intent of ANSI Std N45.2.4.

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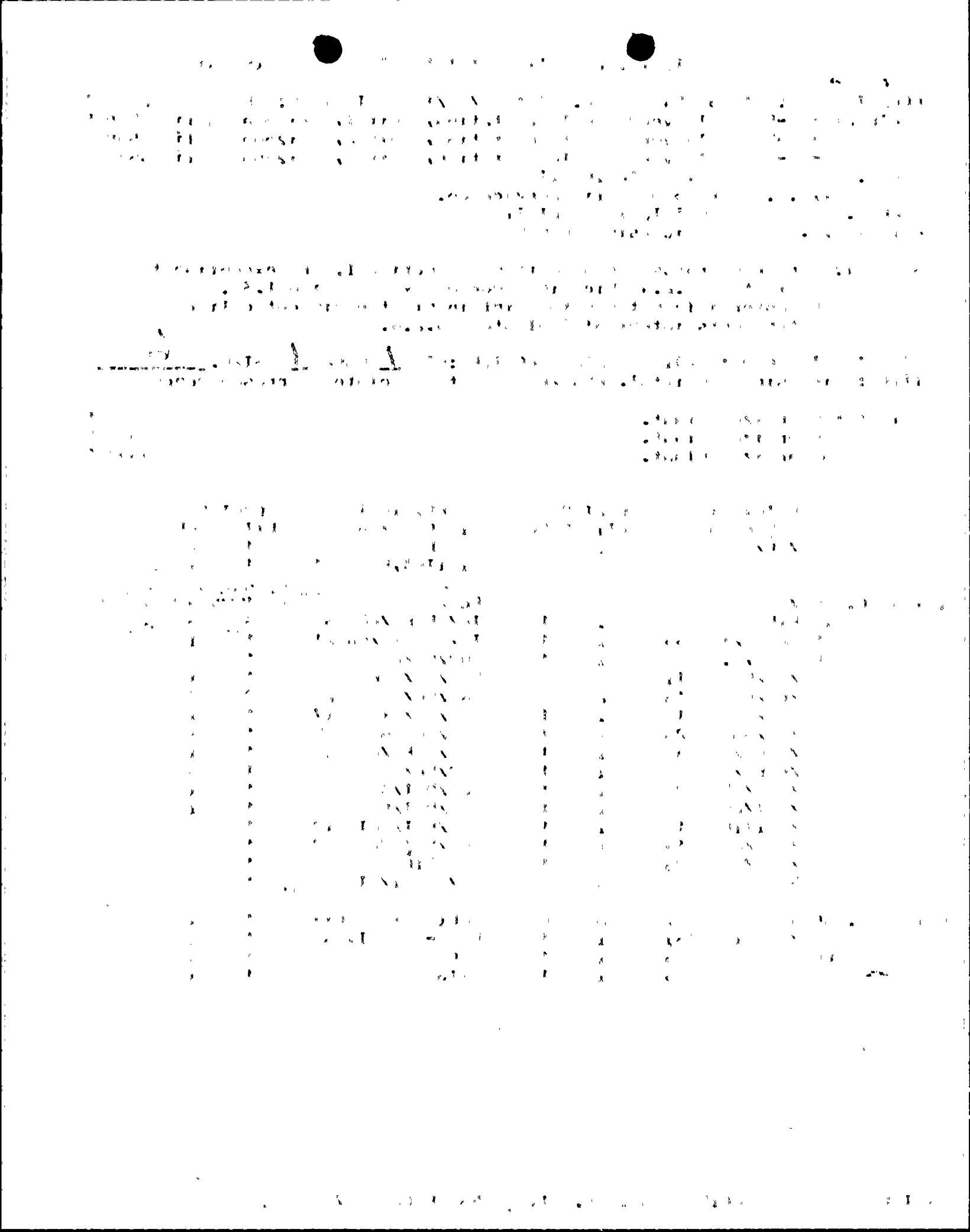

Arizona Public Service Company

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 18, 1984
ANPP-30888 TFQ/JYM

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Exception to R.G.1.30
Docket Nos. STN-50-528/529/530
File: 84-056-026; G.1.01.10

Dear Mr. Knighton:

Attached is a proposed change to section 1.8 of the FSAR concerning an exception to ANSI N45.2.4 which is endorsed by Regulatory Guide 1.30.

PVNGS utilizes a computer information management system to maintain plant equipment calibration status in lieu of the requirements in Section 6.2.1 of ANSI N45.2.4 for tagging or labeling items on completion, indicating the date of calibration and the person who performed the calibration.

The process of determining calibration status has been discussed with Operations/Control Room personnel.

The information on the computer information management system is accessible throughout PVNGS via CRT terminals.

Therefore, PVNGS has met the intent of the requirements of ANSI N45.2.4, Section 6.2.1.

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

EEVBJr/JYM/no
Attachment
cc: E. A. Licitra w/a
A. C. Gehr w/a
R. P. Zimmerman w/a

B001
1/1

ANPP-30888

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 17th day of October, 1984.

Nora E. Meader
Notary Public

My Commission Expires:
My Commission Expires April 6, 1987

REGULATORY GUIDE 1.29: Seismic Design Classification (Revision 3, September 1978)

RESPONSE

For operations phase activities that are comparable to activities occurring during the construction phase, the following interpretations apply to the position of Regulatory Guide 1.29:

A. Position C.1.d of the Regulatory Guide

Systems required for cooling the spent fuel storage pool are required to be designed for the SSE. This is 4 interpreted to apply only to the minimum systems required in an emergency condition and not necessarily to those systems normally providing such cooling.

B. Position C.1.f and Footnote 1 of the Regulatory Guide

The words "or remote manual" are considered to be inserted between the words "automatic" and "closure." This option is included to avoid an unnecessary complication (leading to decreased plant reliability) in lines which would not normally be provided with automatic closing valves.

C. Position C.1.h of the Regulatory Guide

Refer to CESSAR Section 5.4.1.3.

REGULATORY GUIDE 1.30: Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electric Equipment (Revision 0, August 11, 1972)

RESPONSE

The requirements of the referenced Standard (ANSI N45.2.4-1972) will be applied to the Bechtel quality program for construction of safety-related items as interpreted in the Regulatory Position as modified and interpreted below.

A. Section 2.1 Planning. The required planning is frequently performed on a generic basis for application to many installations on one or more projects. This results in standard procedures or plans for installation and inspection and testing which meet the requirements of the Standard. Individual plans for each item or system are not normally prepared unless the work operations are unique; however, standard procedures or plans are reviewed for applicability in each case. Installation plans or procedures are also limited in scope to those actions or activities which are essential to maintain or achieve required quality.

B. Section 3 Preconstruction Verification. The requirements of this section are applied to items which are received and stored prior to installation. They are combined with receiving inspection activities in accordance with ANSI N45.2.2 requirements for items which are installed immediately after receiving inspection.

4 For operations phase activities that are comparable to activities occurring during the construction phase, the following interpretations apply to the position of Regulatory Guide 1.30:

A. Section 5.2:

12 The various tests are performed "as appropriate" as determined by PVNGS Engineering Department based upon the significance of the change or modification.

INSERT 1

C.8. Section 6.2.2:

The requirement that systems tests be made to verify that all parts of a system properly coordinate with each other is interpreted as not requiring that an entire system be re-tested after modification of only a portion of that system. The testing requirements of the Technical Specifications are met for inoperable equipment.

REGULATORY GUIDE 1.31: Control of Ferrite Content in Stainless Steel Weld Metal (Revision 3, April 1978)

RESPONSE

The recommendations of Regulatory Guide 1.31 are followed for non-NSSS ESF components except as noted below:

The delta ferrite determination method specified in Part C is not met. Austenitic stainless steel welding filler materials used in the fabrication and installation of ASME Section III, Class 1, 2, and 3 components are controlled to deposit from 8 to 25% delta ferrite except for 309 and 309L welding filler materials which are controlled to deposit from 5 to 15% delta ferrite and are used when welding carbon or low alloy steel to austenitic stainless steel. Welding filler material 309L is used further for the overlay deposit on the carbon or low alloy steel component nozzles or connecting pipe when post-weld treatment is required.

Meaningful control of delta-ferrite content is based on chemical analysis of the welding filler material to assure that there is an adequate margin above the minimum required to prevent fissuring.

Insert 1 to FSAR Page 1.8-19

B. Section 6.2.1

PVNGS utilizes a computer information management system to maintain plant equipment calibration status including the date of calibration and identity of the person that performed the calibration. The computer information management system provides a more reliable and accessible method of documenting plant equipment calibration status than the use of tags or labels affixed to the equipment.