REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8504120150 DOC.DATE: 85/04/04 NOTARIZED: NO DOCKET #
FACIL:STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528
STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530
AUTH.NAME AUTHOR AFFILIATION
VAN BRUNT,E.E. Arizona Public Service Co.
RECIP.NAME RECIPIENT AFFILIATION
KNIGHTON,G.W. Licensing Branch 3

SUBJECT: Forwards Summary of NRC Comments re proposed program plan, participant listing & handouts for 850308 meeting concerning function & task analysis,per detailed control room design review summary rept & SSER 7.

DISTRIBUTION CODE: A003D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 12
TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737(Generic Ltr 82-33)

NOTES:Standardized plant. 05000528
OL:12/31/84
Standardized plant. 05000529
Standardized plant. 05000530

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	NRR LB3 BC	7	7			
INTERNAL:	ADM/LFMB	1	0	IE/DEPER/EPB	3	3
	NRR PAULSON,W	1	1	NRR/DHFS/HFEB	5	5
	NRR/DHFS/PSRB	1	1	NRR/DL/ORAB	1	1
	NRR/DL/ORB5	5	5	NRR/DSI/CPB	1	1
	NRR/DSI/ICSB	1	1	NRR/DSI/METB	1	1
	NRR/DSI/RAB	1	1	NRR/DSI/RSB	1	1
	REG FILE	1	1	RGN5	1	1
EXTERNAL:	LPDR	1	1	NRC PDR	1	1
	NSIC	1	1			

TOTAL NUMBER OF COPIES REQUIRED: LTTR 34 ENCL 33

Arizona Nuclear Power Project
P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

ANPP-32311-EEVB/WFQ
April 4, 1985

Director of Nuclear Reactor Regulation
Mr. George W. 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(License No. NPF-34)/529/530
Task Analysis Meeting on March 8, 1985
File: 85-056-026; G.1.01.10

References: (1) PVNGS Unit 1 Operating License, NPF-34, License Condition C(19)(c) - DCRDR Summary Report.
(2) Safety Evaluation Report related to the Operation of Palo Verde Nuclear Generating Station Units 1, 2, and 3, Supplement 7 dated December 1984.

Dear Mr. Knighton:

License Condition C(19)(c) of Reference (1) requires that APS submit a supplemental DCRDR Summary Report by August 31, 1985. The required contents of this report are described in Section I.D.1, Chapter 22 and Appendix I of Reference (2).

A requirement of the supplemental DCRDR Summary Report is to address the methodology and results of the PVNGS function and task analysis. This function and task analysis will identify control room operator tasks and operator information/control requirements to be used during PVNGS emergency operations. Thus, based upon License Condition C(19)(c), APS has redeveloped a program plan to satisfactorily complete the function and task analysis requirements. This program plan was presented to the NRC Staff at a March 8, 1985 meeting in Bethesda. The purpose of the meeting was to obtain constructive feedback from the NRC staff on the proposed APS program plan and to obtain assurance that APS was proceeding with an adequate task analysis program.

Attachment 1 of this letter documents our understanding of the staff's comments on the APS proposed program plan to meeting the task analysis requirements. Attachment 2 provides the handouts that were described in detail with your staff at the March 8, 1985 meeting and Attachment 3 lists the participants of the meeting.

If you have any questions concerning any of this information, please contact William Quinn of my staff.

Very truly yours,

E E Van Brunt/DBK

E. E. Van Brunt, Jr.
Executive Vice President
Project Director

A003
1/1

EEVB/MAJ/mb
Attachment

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

ATTACHMENT 1

A summary of the staff's comments on the APS program plan for meeting the function and task analysis requirements are listed below:

NRC Comments:

1. The task analysis must go beyond the procedural step of "VERIFY X". The "VERIFY X" step must be broken into explicit and implicit tasks.

2. Column 7 of Figure 1 (Attachment 2) - "Plant Specific Information/ Controls", must be stated in terms of the "needed characteristics" for the task. The "needed characteristics" must also be stated in the same terms as the Figure 2 control room inventory of existing information/ controls so that there can be a one to one comparison made.

3. The control room inventory performed from plant documentation must be verified by an actual control room walkdown. It was suggested that 2 new columns be added for Figure 2 (Attachment 2): "Verified By Control Room Walkdown" and "Differences/Justification".

4. It was suggested that APS have a data base sorting capability to be able to correlate a given parameter with all the available information/control characteristics and requirements for that parameter.

5. The staff considers any referenced procedure in the Emergency Procedures as an emergency task which needs to be broken down and described in the task analysis (i.e., PVNGS Emergency Procedure 41RO-1ZZ05 - Step 9.2 in Appendix A refers operator to the abnormal operating procedure Loss of Nuclear Cooling Water.)

6. The staff suggests that the task analysis not be limited to maintaining the Safety Function Groups as identified in CEN-152, "Emergency Procedure Guidelines", but should also include the Functional and Optimal Recovery Guidelines of CEN-152 and the consideration of comment 5 above.

7. The staff pointed out that this task analysis has the potential to resolve the EOP technical problems the PSRB found during the PGP/EOP audit in September, 1984.

ATTACHMENT 1
(Continued)

8. The staff was very pleased with the fact that APS had decided to produce a task analysis from scratch rather than continuing to pursue that the Systems Factors Review done during the EOP effort and Control Room Design Review was adequate for meeting the requirements. The staff concurred with the new APS approach (Figures 1 & 2) for meeting the task analysis requirements provided that their comments are addressed. In addition, the staff concurred that the APS approach will fulfill the requirement of indicating how the NUREG-0737 Supplement 1 items (SPDS, EOP's, Control Boards, R.G. 1.97 Instrumentation and Training) were coordinated.

DETAILED DESCRIPTION OF PVNGS TASK ANALYSIS PROCESS

°Details of Tasks & Info/Control Requirements (Figure 1).

°Details of Present Instrumentation & Controls (Figure 2).

COMPARISON

Figure 1	Figure 2
1. Plant Specific Tasks/Subtasks	EOP's Tasks Operator Training
2. Plant Specific Info/Control Requirements	EOP Instruments/Controls Control Boards Instruments/Controls SPDS R.G. 1.97 Requirements.

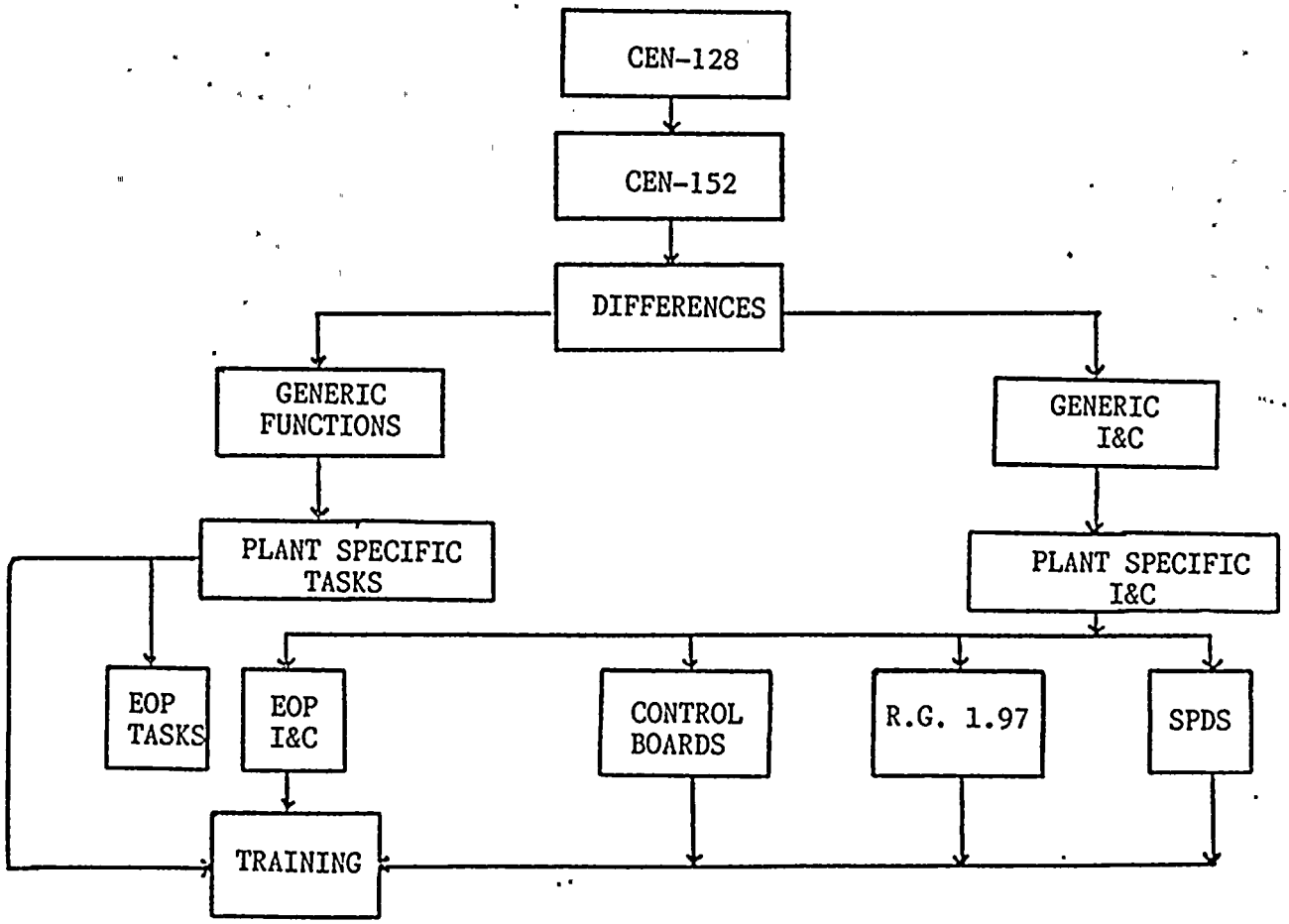
CDM-132 GENERIC FUNCTION/TASK	ROTEDOCE PLANT/ PANCS GENERIC SYSTEM SUBTEDOCES	SYSTEM 00 PANCS GENERIC TASK	PANCS PLANT SPECIFIC TASK/SUB-TASK	SPECIFIC TASK ROTEDOCE	PANCS GENERIC INFORMATION/CONTROL	PLANT SPECIFIC INFORMATION/CONTROL	PS ILC ROTEDOCE	Σ/G AM	EOP STEP #	EOP TASK	FTP ILC	TRAINING ROTEDOCE
1	2	3	4	5	6	7	8	9	10	11	12	13

Figure 1.

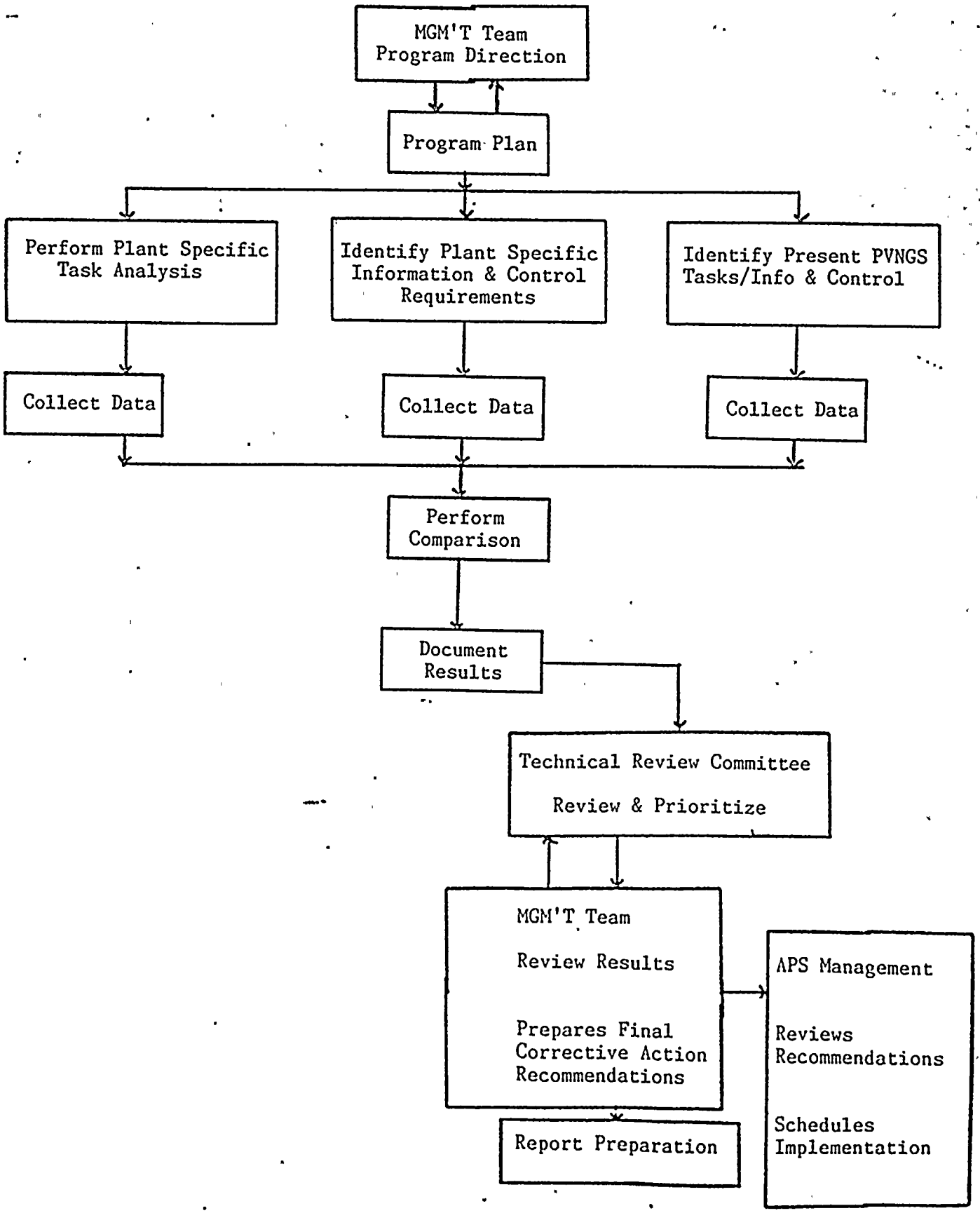
PS INC	I & C DESCRIPTOR	TAG NUMBER	LOCATION	CONTROL BOARD REFERENCE	RANGE/CU	RESOLUTION	LOOP ACCURACY	DATA SHEET REFERENCE	AVAILABILITY	CONTROL POSITION INDICATION	REFERENCE LOOP/ LOGIC	SPDS PARAMETER DESCRIPTION	SPDS RANGE	SPDS REFERENCE	RG 1.97 NAME	RG 1.97 RANGE/CU
14	15	16	17	18	19	20	21	22	23	24	25	26 27	28	29	30	31

Figure 2.

PVNGS
SYSTEM FUNCTION TASK ANALYSIS
&
0737 SUPPLEMENT 1
COORDINATION



PROGRAM PLAN



COMPOSITION & QUALIFICATIONS OF REVIEW TEAMS

° Management Review Team Representatives
- -Plant Operators
- -Nuclear Engineering
- -System Analysist Coordinator.

° Technical Review Committee Representatives
- -Plant Operations
- -Nuclear Engineering
- -System Anlaysist Coordinator
- -Human Factors Specialist.

° Technical Team
- -Licensed Plant Operators
- -Instrument/Controls Engineers
- -System Analysist
- -Human Factors Specialists

RESULTS

° Technical

Information & Control needs on Control Boards

SPDS

° Administrative

Training

Staffing

Procedures

REPORTS

As a part of the August 31, 1985 Supplemental DCRDR Report Submittal.

° Task Analysis Summary.
- -Detailed description of the Task Analysis methodology & results.
- -Sample Checklist Sheets
- -Sample Data Sheets
- -Documentation of Plant Specific tasks and information control needs addressing:
  - *Range
  - *Accuracy
  - *Resolution
  - *Location
  - *References
  - *Availability.

ATTACHMENT 3

March 8, 1985 Meeting Attendees:

E. Licitra	NRC
A. R. Smith	NRC/HFEB
D. Tondai	NRC/HFEB
M. Goodman	NRC/PSRB
G. Sanchez	APS/Nuclear Engineering
M. Jones	APS/Licensing