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# Arizona Nuclear Power Project

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Mr. J. B. Martin, Regional Administrator  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, CA 94596-5368

September 27, 1985  
ANPP-33581-EEVB/BJA

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. STN-50-528 (License No. NPF-41)/529/530  
Revision to PVNGS FSAR Section 17.2  
File: 85-056-026; G.1.01.10

Dear Mr. Martin:

In accordance with the provisions of 10CFR 50.55(f), ANPP is submitting the attached revision to section 17.2.15 of the PVNGS FSAR. This is a change to the ANPP Operation Phase Quality Assurance Program.

The purpose of this change is to allow for more flexibility in the dispositioning of nonconformances that affect the preoperational test program. The revised section requires the evaluation of nonconformances prior to the start of the preoperational test. If it is determined that the nonconformance will not have an impact on the outcome of the test, the test will be performed prior to the final resolution of the nonconformance. If it is determined that the nonconformance will impact the outcome of the test, the nonconformance will be resolved prior to the affected step of the preoperational test.

With the incorporation of this change, the PVNGS Quality Assurance Program will continue to meet the requirements of 10CFR 50, Appendix B because nonconforming items will be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures.

Attached are the revised FSAR pages with change bars to denote the change. If you have any questions on this matter, please contact Mr. W. F. Quinn of my staff.

Very truly yours,

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

EEVB/BJA/slh  
Attachment

cc: R. P. Zimmerman (all w/a)  
E. A. Licitra  
A. C. Gehr  
USNRC Document Control Desk, Washington, D.C.

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STATE OF ARIZONA     )  
                              ) ss.  
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Executive Vice President, Arizona Nuclear Power Project, 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.

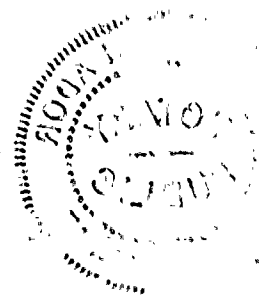
Edwin E. Van Brunt, Jr.  
Edwin E. Van Brunt, Jr.

Sworn to before me this 27 day of September, 1985.

Dora E. Meador  
Notary Public

My Commission Expires:

My Commission Expires April 6, 1987



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the bypassing of required inspections, tests, and other critical operations. The application and removal of status indicators such as tags, markings, labels, and stamps are also procedurally controlled. Vendors of safety-related items are required in contracts and/or purchase orders to establish adequate measures to assure that required tests and inspections are completed and documented prior to acceptance.

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#### 17.2.15 NONCONFORMING MATERIAL, PARTS, OR COMPONENTS

The Operations Quality Assurance Program requires that procedures be prepared and implemented which describe the method of controlling material, parts, components, or services which do not conform to defined requirements to prevent their inadvertent use or installation. The procedures developed to implement this requirement describe the method of identification, documentation, segregation, review, evaluation, disposition and notification of affected organization of nonconforming materials, parts, components or services.

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Suppliers, contractors, and subcontractors who furnish, fabricate, erect, or install safety-related material or equipment and are required in the procurement document to have a quality assurance program shall also be required to implement, as part of their QA program, acceptable procedures for the control of nonconforming items as described in this section.

The procedures established by the supplier, contractor, or subcontractor shall include the requirement to obtain APS acceptance of nonconformances dispositioned as "accept-as-is" or "repair" (to less than the original design requirements). The documentation of the nonconformance is made part of the inspection records and is forwarded to APS for review and assessment. This review and assessment is the responsibility



QUALITY ASSURANCE DURING  
THE OPERATIONS PHASE

of the organization that generated the procurement document or is responsible for the governing document. The responsible group will solicit review and comments from other interfacing groups as necessary. Nonconformances dispositioned as "accept-as-is" or "repair" will receive final approval in accordance with approved procedures. Procedures to coordinate this review and assessment will be developed by the responsible organization.

14| The Manager, Transition and the PVNGS Plant Manager are  
12| responsible for development of procedures that meet the  
12| requirements of this section to control the handling of  
12| nonconforming material, parts, components, and services under  
12| their jurisdiction. These procedures provide for the segregation,  
12| if practical, and tagging of nonconforming material,  
12| parts, or components. Where such segregation is impossible  
12| or impractical, the nonconforming item shall be conspicuously  
12| tagged or identified by other means to indicate it is noncon-  
12| forming and to identify the nonconformance. Installation of  
12| nonconforming items will only be considered when an evaluation  
12| concludes that the nonconforming condition can be resolved  
12| with the item installed. If the item is already installed  
12| at the time the nonconforming condition is identified, equip-  
12| ment control measures shall preclude inadvertent use of the  
12| item where such use could present a hazard to equipment or  
12| personnel. ~~Nonconformances identified prior to the start of~~  
12| ~~a preoperational test will be resolved (i.e., dispositioned)~~  
12| ~~prior to the start of the test.~~ If items of nonconformance  
12| are identified during the test they will be documented,  
12| evaluated and dispositioned prior to the acceptance of the  
12| test results. APS Procedures provide for notification of  
12| vendors if materials, parts, components, or services pro-  
12| vided by them are found to contain defects or noncompliances  
12| which are reportable to NRC.

Nonconforming conditions may be identified by any individual at PVNGS. Reports of nonconformances shall include the

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Nonconformances identified prior to the start of a preoperational test will be evaluated to determine the potential impact on the outcome of the test. If it is determined that an item will impact the results of the test, it will be resolved (i.e., dispositioned) prior to commencing the affected step(s) of the test.



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identification of the item, a description of the nonconforming condition, the disposition of the nonconformance, the reinspection requirements, and the signatures of those persons or groups approving the disposition. Reinspection or retest requirements are required to be the same or equivalent to the original inspection method. The inspection, testing, rework, and repair procedures will also be documented.

Dispositions as "accept as is" or "repair" (to less than original design requirements) of nonconformances require the written approval of the applicable engineering organization. Through completion of Phase I testing, Bechtel Engineering is responsible for dispositioning of Startup Nonconformance Reports.

The APS Corporate QA Department is responsible for verification of Startup Nonconformance Report completion and acceptance. Issuance, distribution, and control of Startup Nonconformance Reports is the responsibility of the Startup Organization.

Commencing with Phase II Testing, the APS Corporate QA Department is responsible for issuance, distribution, control, and verification of nonconformance report completion and acceptance.

The APS Corporate QA Department shall be responsible for analyzing for trends, at least annually, nonconformance reports generated at PVNGS as well as the effectiveness of the nonconformance identification and control system used at PVNGS. The results of this analysis shall be reported in writing to the Startup Manager, PVNGS Plant Manager, Director, Technical, Director, Corporate QA/QC and Nuclear Safety Group Manager, as appropriate.

#### 17.2.16 CORRECTIVE ACTION

The Operations Quality Assurance Program requires that procedures be established and implemented to assure that conditions

