

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8511120062 DOC. DATE: 85/11/08 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
 AUTH. NAME AUTHOR AFFILIATION
 VAN BRUNT, E.E. Arizona Nuclear Power Project (formerly Arizona Public Serv
 RECIP. NAME RECIPIENT AFFILIATION
 KNIGHTON, G.W. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards schedule for implementing remaining NUREG-0737,
 Suppl 1 requirements for Units 1 & 2 SPDS & Unit 2 emergency
 operating procedures, emergency response facilities & human
 engineering discrepancies. W/Reg Guide 1.97 schedule.

DISTRIBUTION CODE: A003D COPIES RECEIVED: LTR 1 ENCL 1 / SIZE: 6
 TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737 (Generic Ltr 82-33)

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

| RECIPIENT ID CODE/NAME | COPIES LTTR ENCL | RECIPIENT ID CODE/NAME | COPIES LTTR 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 | 2 2 | 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 |
| <u>REG FILES</u> | 1 1 | RGN5 | 1 1 |
| EXTERNAL: 24X | 1 1 | LPDR | 1 1 |
| NRC PDR | 1 1 | NSIC | 1 1 |

TOTAL NUMBER OF COPIES REQUIRED: LTTR 36 ENCL 35



Arizona Nuclear Power Project

P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

November 8, 1985
ANPP-33965 EEVB/WFQ/JKO

Director of Nuclear Reactor Regulation
Attention: Mr. G. W. Knighton, Project Director
PWR Project Directorate #7
Division of Pressurized Water Reactor Licensing - B
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1 and 2
Schedule of NUREG 0737 Supplement 1 Items
Docket Nos. STN-50-528 (License No. NPF-41)/529
File: 85-056-026; G.1.01.10

Dear Mr. Knighton:

The attachments to this letter provide the schedule for implementing the remaining requirements of NUREG 0737 Supplement 1 for PVNGS Unit 2. Attachment 1 provides the schedule for any incomplete items associated with the Safety Parameter Display System, Emergency Operating Procedures and the Emergency Response Facilities. Attachment 2 provides the schedules for completing the corrections to the Human Engineering Discrepancies (HED's). Finally, Attachment 3 provides the implementation schedule for completing the remaining Regulatory Guide 1.97 Variables.

This letter also addresses the schedule for the audit of the Safety Parameter Display System for Unit 1 and closes out license condition 2.C.(11)(a) for NPF-41. (See attachment 1).

If you have any questions or require additional information, please contact William F. Quinn of my staff.

Very truly yours,

EE Van Brunt / PDR

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

EEVB/JKO/ds

Attachments

cc: E. A. Licitra
M. C. Ley
R. P. Zimmerman
A. C. Gehr

8511120062 851108
PDR ADCK 05000528
F PDR



A003
11



2025 11 14

ATTACHMENT 1

1. Safety Parameter Display System (SPDS)

The SPDS will be ready for an NRC audit by April 30, 1986. Since the SPDS design is identical for Units 1 and 2, both Units will be ready for the audit at the same time.

2. Detailed Control Room Design Review (DCRDR)

The resolutions for the Human Engineering Discrepancies (HED's) and audit findings that were identified as a result of the DCRDR and were required to be corrected prior to fuel load have not been completely implemented into Unit 2. In Attachment 2, there is a list of remaining HED's along with the implementation schedule for the resolutions of the HED's.

3. Regulatory Guide 1.97 Revision 2 (R.G. 1.97)

Instrumentation for the R.G. 1.97 variables was described in letters dated August 1, 1984 (ANPP-30092) and December 5, 1984 (ANPP-31334). For Unit 2, this instrumentation will have been installed, tested and considered functional by fuel load with the exception of the variables listed in Attachment 3. A schedule for completing the testing of only the R.G. 1.97 instruments are also provided in Attachment 3.

4. Emergency Operating Procedures (EOP's)

The requirements of Supplement 1 to NUREG 0737 were to use approved emergency technical guidelines to upgrade the plant specific EOP's. Revision 2 of CEN-152, "Emergency Procedure Guidelines", was approved by the staff in a letter dated April 16, 1985 and subsequently, we have upgraded the PVNGS EOP's to Revision 2. The EOP's for Unit 1 have also been upgraded to Revision 2. Therefore, this letter serves to close out the commitment made in the letter dated July 10, 1985 (ANPP-32987) from ANPP to the NRC. We also consider this item to be complete for Unit 2.

5. Emergency Response Facilities (ERF's)

The ERF's are complete with the exception of the testing required for the instruments associated with R.G. 1.97.

ATTACHMENT 2
(HED's)

| HED NUMBER | AUDIT FINDING | ACTION TO CLOSE | SCHEDULE | REFERENCE LETTER |
|--|---|---|----------------------------------|---|
| 49C 64C 100C 101B 98C 7.7 5.15 53C 172 | 1.2 1.2 1.2 1.2 1.3 7.7 5.15 7.7 | Install non-glare bulbs | Feb. 15, 1986 | Letter to NRC dated Aug. 30, 1985 (ANPP-33802) |
| 68B | 1.4 | Install control room carpet | Prior to exceed- ing 5% power | |
| 11B | 2.5 4.1 5.2 6.2 6.13 | Install missing nameplates on control boards | Prior to fuel load | Letters to NRC dated June 30, 1983 (ANPP-24212) and March 14, 1984 (ANPP-29066) |
| 137A | 3.13 6.29 6.30 | Correct wrong nameplates | Prior to fuel load | Letters to NRC dated June 30, 1983 (ANPP-24212) and March 14, 1984 (ANPP-29066) |
| 79A 115C | 6.38 6.43 6.45 | Install missing mimics and correct some existing ones | Prior to fuel load | Letter to NRC dated June 30, 1983 (ANPP-24212) |
| | 6.41 | Correct color lenses | Prior to initial criticality | |
| 128A | | Install annunciator windows with correct color | Prior to fuel load | Letter to NRC dated March 14, 1984 (ANPP-29066) |
| 72C | 5.33 | Adjust slide wire resistors on MCC's | Prior to exceed- ing 5% power | |

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29

30

31

32

33

34

35

36

37

38

39

40

41

42

43

44

45

46

47

48

49

50

51

52

53

54

55

56

57

58

59

60

61

62

63

64

65

66

67

68

69

70

71

72

73

74

75

76

77

78

79

80

81

82

83

84

85

86

87

88

89

90

91

92

93

94

95

96

97

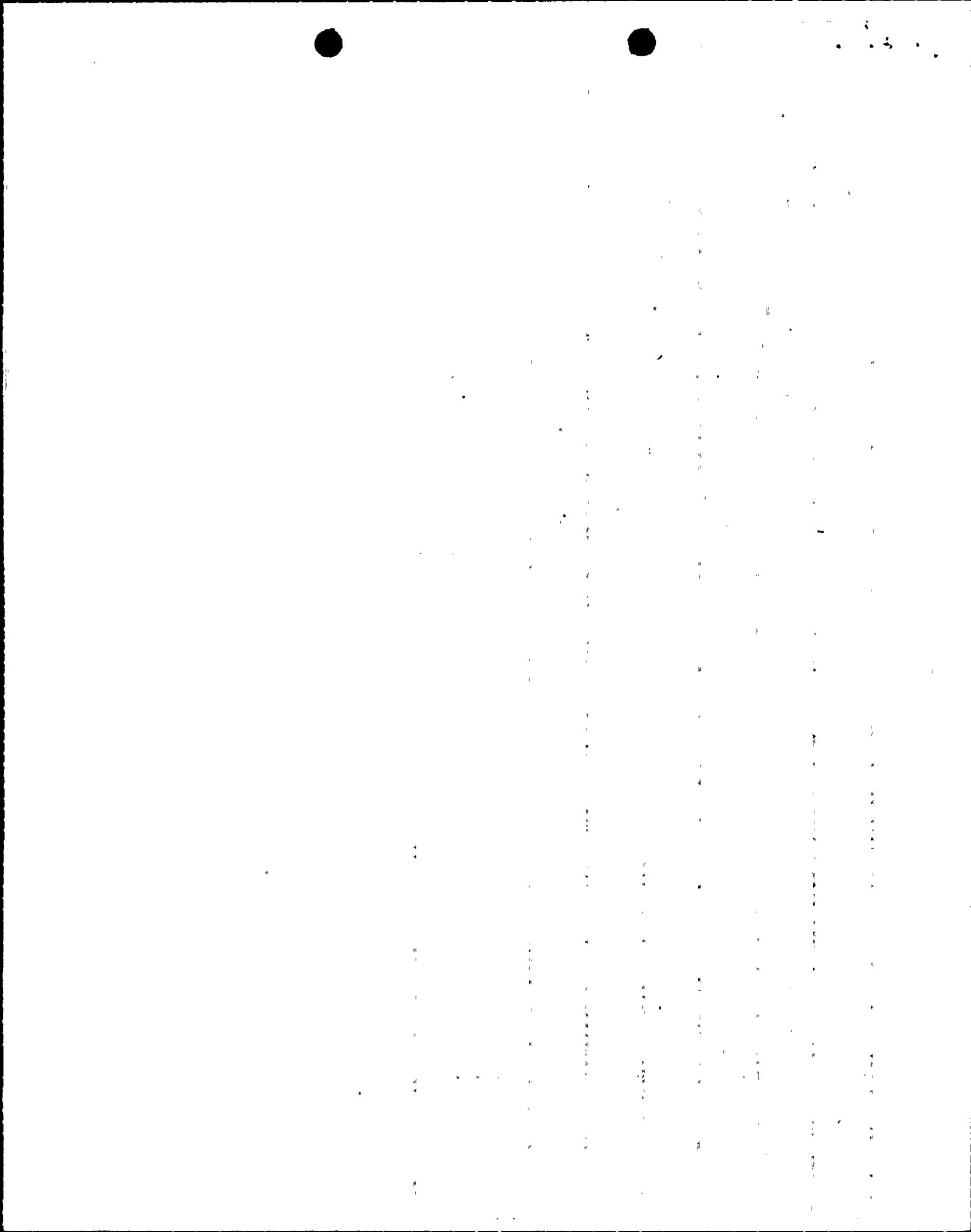
98

99

100

ATTACHMENT 2
(Continued)

| HED NUMBER | AUDIT FINDING | ACTION TO CLOSE | SCHEDULE | REFERENCE LETTER |
|---------------|------------------|---------------------------------|-----------------------------|--|
| 151A | | Install writing surfaces at RSP | Prior to exceeding 5% power | Letter to NRC dated Oct 29, 1984 (ANPP-30986) |
| 169A | | Issue Procedure | Prior to exceeding 5% power | |
| 157A | | Install fire detector | Prior to exceeding 5% power | Letter to NRC dated October 29, 1984 (ANPP-30986) |
| 158A | | Install zone markings on RSP | Prior to exceeding 5% power | |
| 152A | | Correct Wrong Nameplates on RSP | Prior to exceeding 5% power | |
| | | | | |



ATTACHMENT 3
(R.G. 1.97)

| TYPE | CATE- GORY | VARIABLE | SCHEDULE | JUSTIFICATION |
|------|---------------|---|------------------------------|--|
| A | 1 | Degrees of subcooling | Prior to 5% power | Covered under Inadequate Core Cooling Instrumentation (ICCI) Commitments (SSER 6 II.F.2) |
| B | 3 | Control rod position | Prior to initial criticality | Instrumentation is installed immediately after fuel load, prior to initial criticality |
| B | 1 | Core exit temperature | Prior to 5% power | Post Accident Sampling System (ANPP-33573) |
| B | 1 | Coolant level in reactor | Prior to 5% power | |
| B | 3 | RCS solub. Boron Conc. (0-6000) | Prior to 5% power | |
| C | 1 | Radioactive concentration or radiation level in circulating primary coolant | Prior to initial criticality | No activity in reactor coolant system prior to initial criticality |
| C | 3 | Analysis of primary coolant | Prior to 5% power | Capability provided by PVNGS Grab Sample PASS (ANPP-33573) |
| C | 3 | Containment area radiation monitors | Prior to Mode 4 | See Footnotes (1) and (2) |
| C | 3 | Effluent radioactivity-noble gas effluent from condenser air removal system exhaust | Prior to Mode 4 | See Footnotes (1) and (2) |
| C | 2 | Containment effluent radioactivity-noble gases from identified release points | Prior to Mode 4* | See Footnote (1) |
| C | 2 | Radiation exposure rate | Prior to initial criticality | No activity prior to initial criticality |
| C | 2 | Effluent radioactivity-noble gases from buildings | Prior to Mode 4* | See Footnotes (1) and (2) |
| E | 1 | Containment area radiation | Prior to Mode 4 | See Footnotes (1) and (2) |
| E | 2 | Radiation exposure rate | Prior to initial criticality | No activity prior to initial criticality |
| E | 2 | Auxiliary building airborne radioactivity | Prior to Mode 4* | See Footnotes (1) and (2) |
| E | 2 | Condenser air removal system exhaust | Prior to Mode 4 | See Footnotes (1) and (2) |
| E | 2 | Common plant vent discharge any of above | Prior to Mode 4* | See Footnote (1) |

* Two of these monitors are required by fuel load per the Tech. Specs. and they will be done by fuel load. We are taking no exceptions to the Tech. Specs.

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

ATTACHMENT 3
(Continued)

| TYPE | CATE- GORY | VARIABLE | SCHEDULE | JUSTIFICATION |
|------|---------------|---|------------------------------|--|
| E | 2 | Vent from steam generator safety relief valves or atmospheric dump valves | Prior to mode 4 | See Footnotes (1) and (2) |
| E | | Radiation exposure meters | Prior to initial criticality | No activity prior to initial criticality |
| E | | Primary coolant and sump (grab sample) | Prior to exceeding 5% power | Post Accident Sampling System (ANPP-33573) |

FOOTNOTES:

- (1) No activity until initial criticality. These monitors are required by the Technical Specifications prior to Mode 4.
- (2) This takes exception to NUREG 0737 commitments.

1. *Phragmites australis* (Cav.) Trin. ex Steud.

[illegible]