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ANPP-33895-EEVB/WFQ
November 1, 1985

U. S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Attention: Mr. D. F. Kirsch, Acting Director
Division of Radiation Safety and Safeguards

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Docket No. STN 50-528 (License No. NPF-41)
Training/Emergency Planning Interface Concerns
File: 85-019-026; D.4.33.2

References: Letter to R. A. Scarano (NRC) from E. E. Van Brunt, Jr., (ANPP),
dated August 22, 1985, NRC Inspection 50-528/85-10

Dear Sir:

The referenced letter provided our response to Notice of Violation 50-528/85-10/01 concerning timeliness of initial training and annual retraining on emergency preparedness. Item II on Page 3 in Attachment A of the Referenced Letter stated:

"An overall evaluation will be coordinated by training to address the root causes of the violation and to identify any additional problems relative to Training/Emergency Planning interface. ANPP will provide a letter to the NRC by November 1, 1985 which describes the results of the evaluation along with the corrective actions identified and a schedule for the implementation".

This letter provides our response regarding this evaluation.

An evaluation was completed by Training Management on October 18, 1985 and the evaluation report is being finalized. The conclusion of the evaluation determined that the root cause of the violation was: The previous PVNGS training/documentation system for emergency preparedness training placed the responsibility to ensure training is completed on the various department supervisors. However, the training status information provided by the training department to the supervisors was inaccurate and not periodic. In addition, the responsibility to provide an accurate list of the personnel qualified to support the Emergency Plan was not clear.

85-2130333 opp.



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The conclusion of this evaluation supports the previous determination of the root cause discussed in the referenced letter. No additional concerns or corrective actions have been identified.

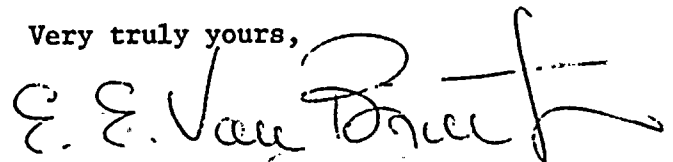
As a result of the original root cause determination, the Emergency Plan Training Procedure 8N718.04.00 was revised (Revision 2 dated 7/3/85) to include the following items:

1. Section 3.3.2 - States the Training Manager is responsible for "Providing to the Manager, Emergency Planning, names of individuals who are now fully qualified for inclusion onto the Emergency Plan Staffing List".
2. Section 3.1.6 - States the Manager, Emergency Planning is responsible for "Ensuring the Emergency Plan Staffing List is current after receiving input from the PVNGS Training Manager and/or responsible supervisors.
3. Section 3.1.3 - States the Manager, Emergency Planning is responsible for "Providing to Supervisors on a bimonthly basis, the Emergency Plan Staffing List for review and update of personnel currently assigned to their group".
4. Section 3.4.2 - States that ANPP Supervisors shall be responsible for "Reviewing the Emergency Plan Staffing List, as provided, and forward any personnel additions or deletions to the Manager, Emergency Planning.
5. Section 3.4.1 - States that ANPP Supervisors shall be responsible for "Ensuring their designated personnel maintain Emergency Plan qualifications by meeting all applicable Emergency Plan Training/Retraining Requirements within the yearly training cycle.

The Emergency Planning Staffing List is presently being verified manually until such time as the Training Records Management Computer System is made accurate. We believe this information addresses the commitment to evaluate the root causes of the violation.

Please contact me if you have any questions.

Very truly yours,



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

EEVB/WFQ/dlm

cc: A. C. Gehr
R. P. Zimmerman

G. M. Temple
E. A. Licitra

