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 HAYNES, J. G. Arizona Nuclear Power Project (formerly Arizona Public Serv
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards comments on facility draft license per NRC 870306 request. No changes suggested for Section 1. Suggested changes for Section 2 include deleting paragraph C. 5 entirely because util already submitted inservice insp program.

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 TITLE: Licensing Submittal: PSAR/FSAR Amdts & Related Correspondence

NOTES: Standardized plant. M. Davis, NRR: 1Cy.

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| | ID CODE/NAME | | LTTR | ENCL | | ID CODE/NAME | | LTTR | ENCL |
| | PWR-B EB | | 1 | 1 | | PWR-B PEICSB | | 2 | 2 |
| | PWR-B FOB | | 1 | 1 | | PWR-B PD7 LA | | 1 | 1 |
| | PWR-B PD7 PD | | 1 | 1 | | LICITRA, E | | 2 | 2 |
| | PWR-B PEICSB | | 1 | 1 | | PWR-B RSB | | 1 | 1 |
| INTERNAL: | ACRS | | 6 | 6 | | ADM/LFMB | | 1 | 0 |
| | IE FILE | | 1 | 1 | | IE/DEPER/EPB | | 1 | 1 |
| | IE/DQAVT/QAB | | 1 | 1 | | NRR BWR ADTS | | 1 | 0 |
| | NRR PWR-B ADTS | | 1 | 0 | | NRR ROE, M. L | | 1 | 1 |
| | NRR/DHET/MTB | | 1 | 1 | | OGC/HDS1 | | 1 | 0 |
| | <u>REG FILE</u> 01 | | 1 | 1 | | RM/DDAMI/MIB | | 1 | 0 |
| EXTERNAL: | BNL (AMDTS ONLY) | | 1 | 1 | | DMB/DSS (AMDTS) | | 1 | 1 |
| | LPDR | | 1 | 1 | | NRC PDR | | 1 | 1 |
| | NSIC | | 1 | 1 | | PNL GRUEL, R | | 1 | 1 |
| NOTES: | | | 1 | 1 | | | | | |

1. The first step in the process of the investigation is the identification of the problem. This is done by the investigator who is assigned to the case. The investigator will then gather information about the problem and the people involved. This information will be used to develop a plan of action.

[illegible]

SECRET

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[illegible]



Arizona Nuclear Power Project

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

March 19, 1987
161-00087-JGH/PGN

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 3
Docket No. STN 50-530
Response to Draft License (PVNGS Unit 3)
File: 87-D-056-026

Reference: Letter from G. W. Knighton (NRC) to E. E. Van Brunt, Jr. (ANPP)
dated March 6, 1987. Subject: Palo Verde Nuclear Generating
Station, Unit 3 Draft License.

Dear Sir:

The referenced letter provided a copy of the PVNGS Unit 3 draft license and requested ANPP to review and provide any comments in writing. Attached are ANPP's comments on the Unit 3 draft license.

Please contact Mr. William Quinn of my staff, if you have any questions.

Very truly yours,

J. G. Haynes
Vice President
Nuclear Production

JGH/PGN/dlm
Attachment

cc: O. M. De Michele (all w/a)
E. E. Van Brunt, Jr.
A. C. Gehr
G. W. Knighton
R. P. Zimmerman
J. B. Martin

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ATTACHMENT

SUGGESTED CHANGES TO THE DRAFT UNIT 3 OPERATING LICENSE

Section 1. No changes suggested.

Section 2. Suggested changes are listed below:

1) Paragraph C.(1)

Attachment 1 not submitted for review.

2) Paragraph C.(1)

Delete the sentence "In addition operation above Mode 5 shall not proceed until successful testing and operability of Emergency Diesel Generators in accordance with 10CFR 50, Appendix A, General Design Criterion 17, is achieved". This is redundant with Paragraph D.(2).

3) Paragraph C.(4)

Change the second line of the paragraph to read "of the FSARs (Palo Verde and CESSAR) as modified by ANPP letter 40056, dated February 9, 1987, made in accordance with". (Underscoring indicates change).

4) Paragraph C.(5)

Delete the entire paragraph. This License Condition is not required because ANPP has already submitted the Inservice Inspection Program by ANPP letter 161-00058, dated March 11, 1987.

5) Paragraph D.(1)

Change the third line of the paragraph to read "exemption is authorized by law and will not present an undue risk". (Underscoring indicates change).

6) Paragraph D.(2)

Change the third line of the paragraph to read "fuel load and operation up to Mode 5 with the Unit 3 B Emergency". (Underscoring indicates change).

7) Paragraph F.

Change the fourth line of the paragraph to read "as approved in the SER through Supplement 11, subject to the following". (Underscoring indicates change).

