

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

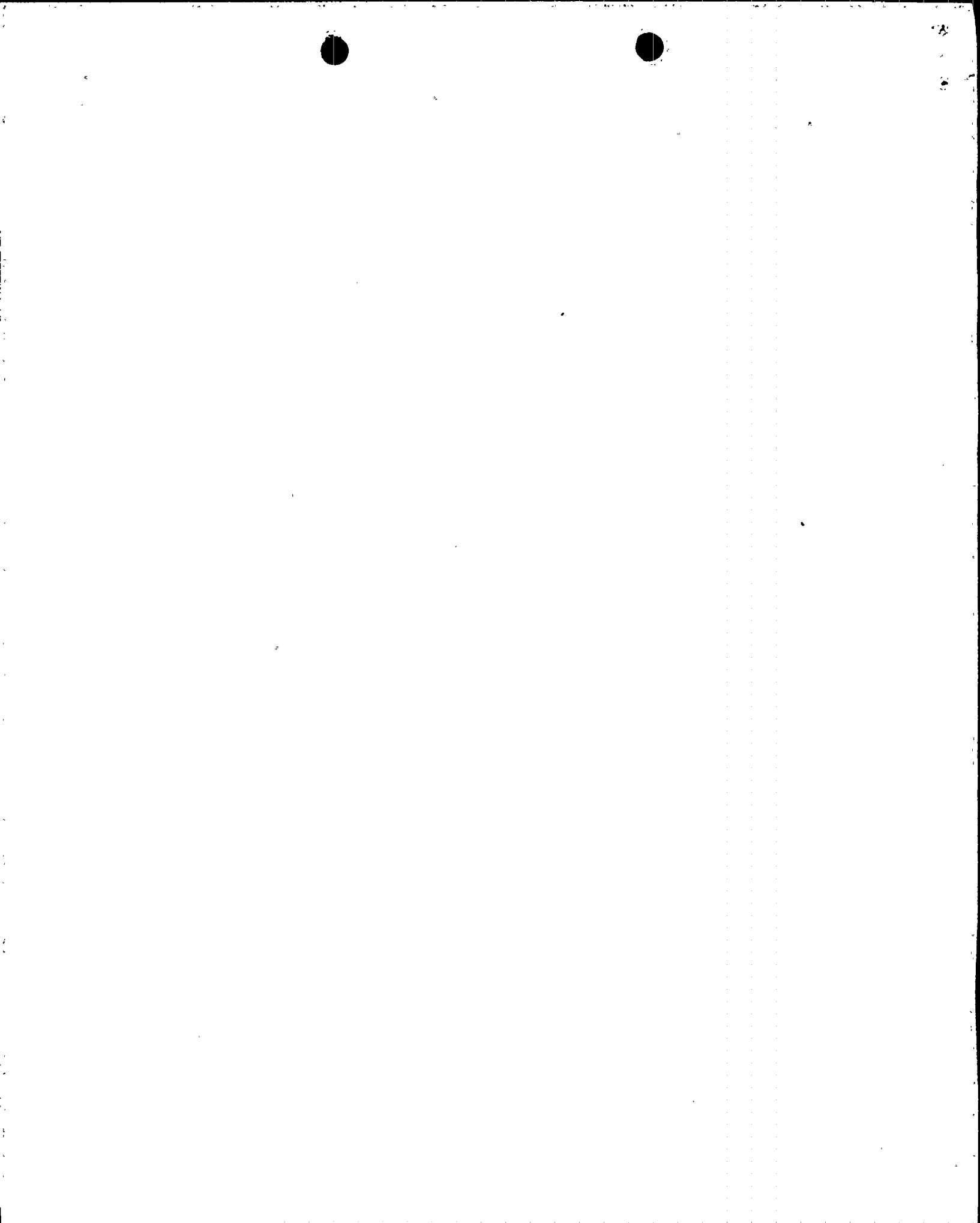
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 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards corrected pages to QA program prior to
 implementation, per 10CFR50.54(3).

DISTRIBUTION CODE: IE43D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 7
 TITLE: 50.54.a.3 & 50.55.f.3 Change to SAR QA Program

NOTES: Standardized plant. 05000528
 Standardized plant. 05000529
 Standardized plant. 05000530

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	NRR/DLPQ/QAB10A	1 1	<u>REG FILE</u> 02	1 1
	RGN5 FILE 01	1 1		
EXTERNAL:	DMB/DSS	1 1	LPDR	1 1
	NRC PDR	1 1		
NOTES:		1 1		





Arizona Nuclear Power Project

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March 24, 1988
161-00899-EEVB/SGB

Docket Nos. STN 50-528/529/530

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Change to Quality Assurance Program in
Accordance with 10CFR50.54(3), Conditions
of Licenses
File: 88-005-419.05

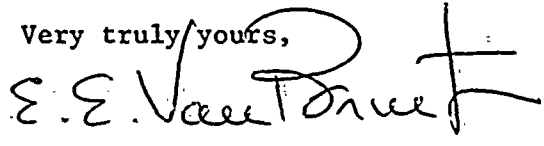
In accordance with 10CFR50.54(3) Arizona Public Service is submitting for approval, prior to implementation, a change to the Quality Assurance Program described in the PVNGS Final Safety Analysis Report (FSAR).

The identification of this change, the reason for the change, the basis for concluding that the change continues to satisfy 10CFR50 Appendix B, and the affected pages are attached to this letter.

In accordance with the requirements of 10CFR170.12(e), an application fee of \$150.00 is being forwarded to the Facilities Program Coordinator of LFMB.

If there are any questions which pertain to this submittal, please contact
A. C. Rogers (602) 371-4041.

Very truly/yours,



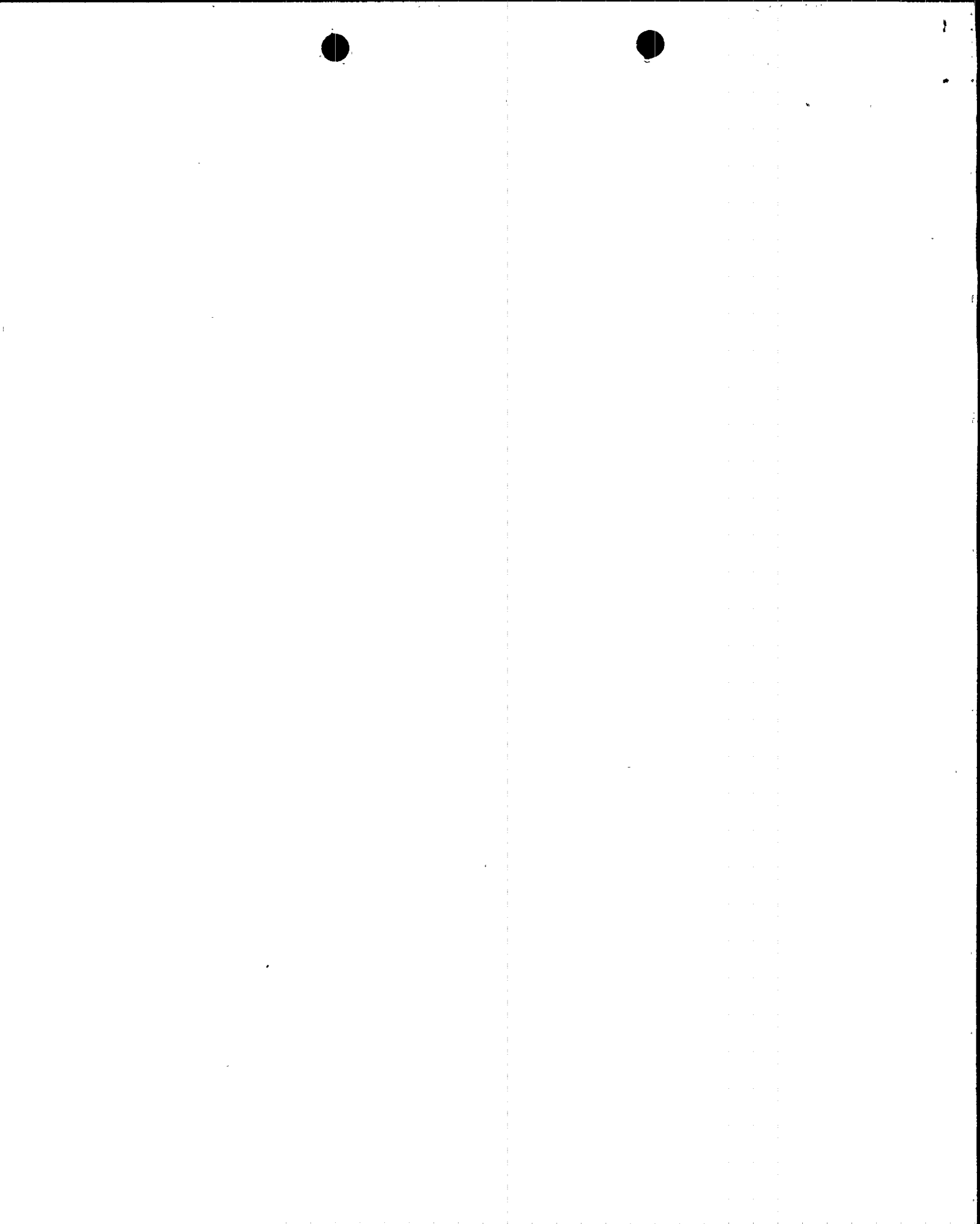
E. E. Van Brunt, Jr.
Executive Vice President
Project Director

EEVB/SGB/cal
Attachment

cc: T. J. Polich (w/a)
R. M. Diggs (w/WFD \$150)

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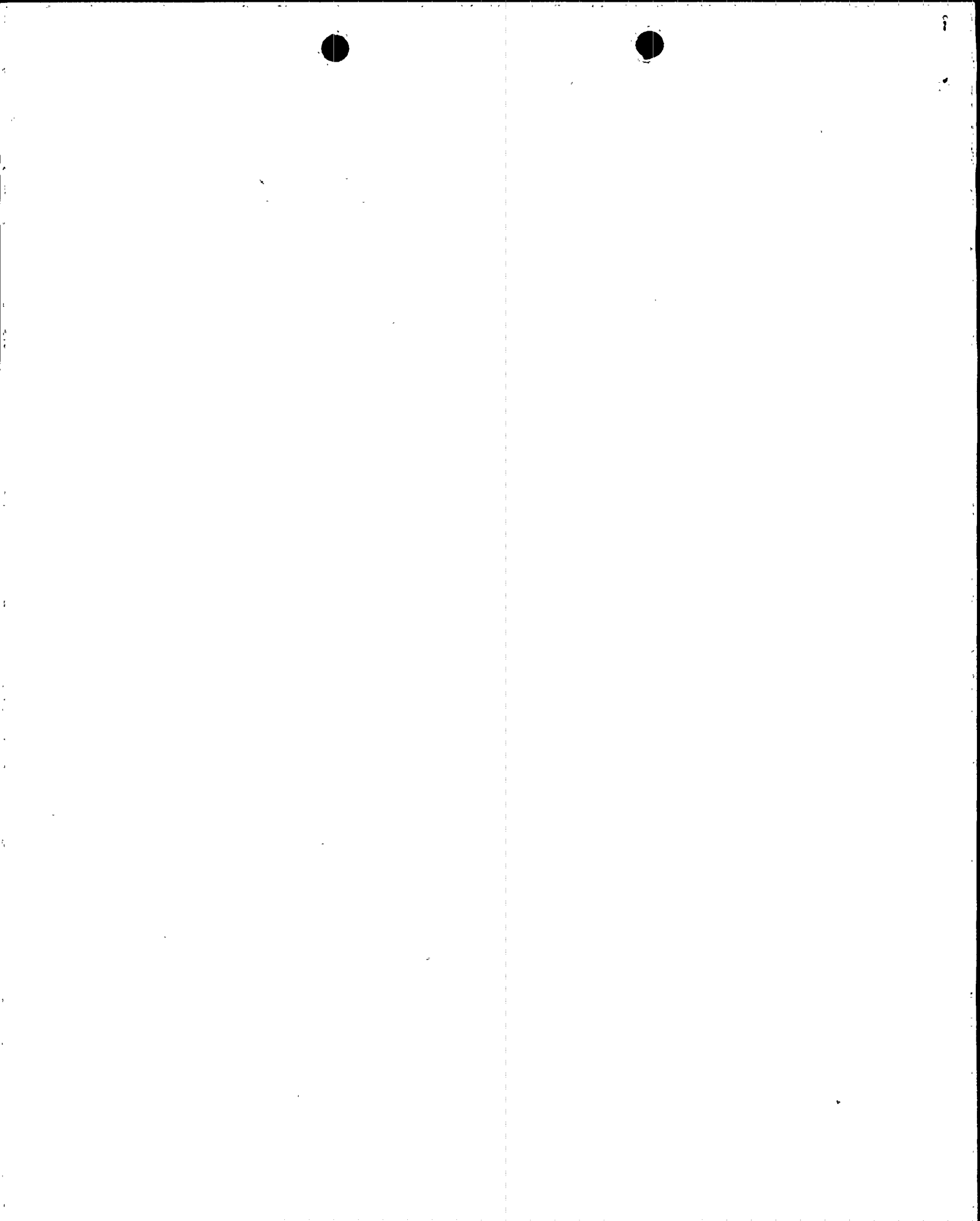
TEA3
11



IDENTIFICATION OF CHANGE

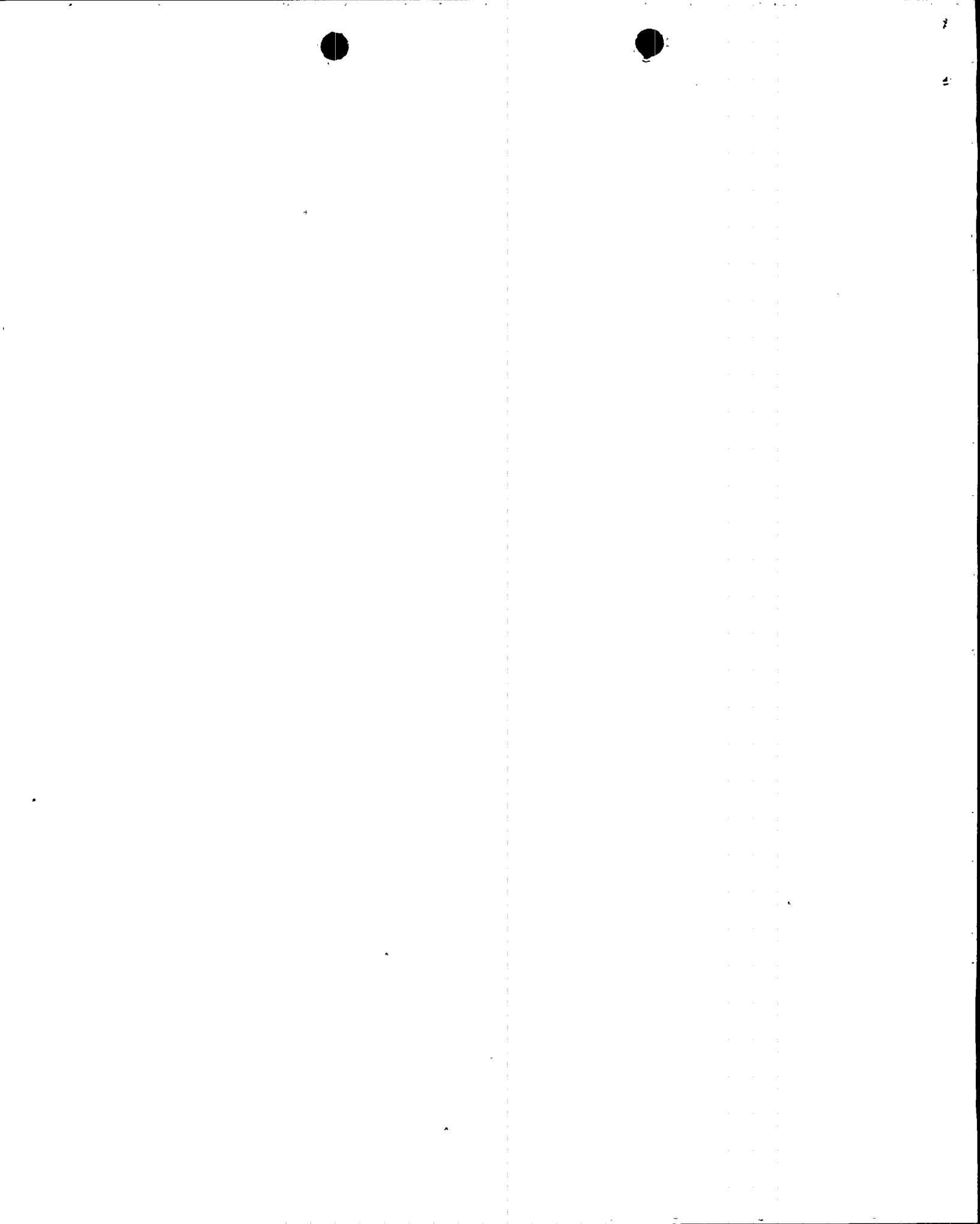
The PVNGS FSAR, Section 17.2, Quality Assurance During the Operations Phase contains by reference to Section 1.8, Conformance to NRC Regulatory Guides a commitment to comply with NRC Regulatory Guide 1.143, Design Guidance for Radioactive Waste Management, Systems, Structures, and Components Installed in Light-Water - Cooled Nuclear Power Plants, Revision 0.

Dependent upon approval APS will incorporate into Section 1.8 of the PVNGS FSAR, an exception to Revision 0 that is consistent with Revision 1. This exception will exclude instrumentation and sampling systems beyond the first root valve from the scope of the commitment to Regulatory Guide 1.143, Rev 0.



REASON FOR CHANGE

Approval of this change will enhance the operation and availability of the Radwaste Management System by providing a practical approach to procurement and installation of non-critical instrumentation and sampling components. The reliability of the system will not be changed since the components will be purchased and installed per industrial codes and standard requirements as stated in Regulatory Guide 1.143.

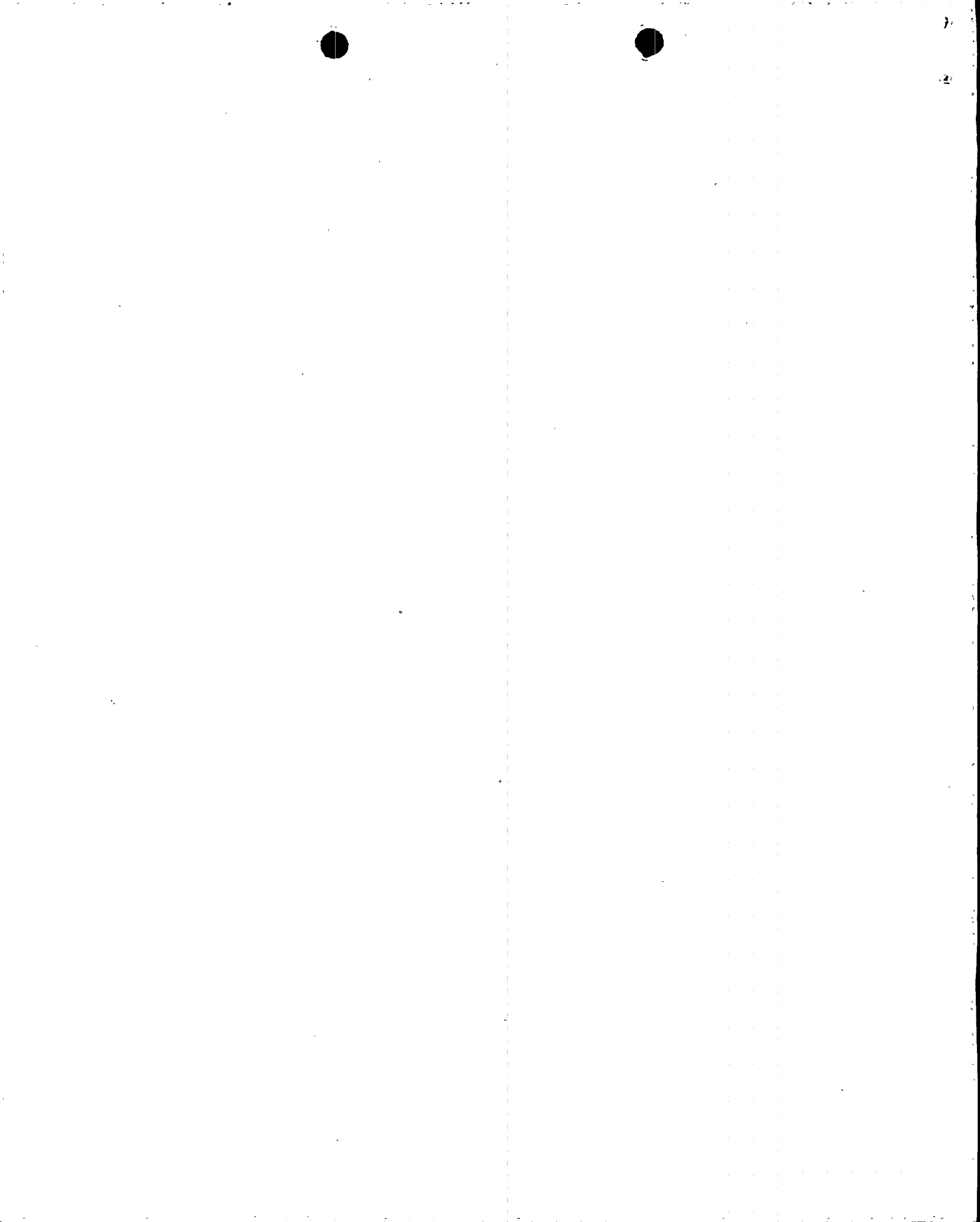


BASIS FOR HOW THE CHANGE
CONTINUES TO SATISFY
10CFR APPENDIX B

The Design of Radioactive Waste Systems will not be affected by this change. All future changes to the sampling and instrumentation portions of these systems shall meet appropriate industry standards.

The change will not affect equipment important to safety since the leakage caused by failure of sample line or instrument line is limited and operator actions can easily isolate leakage. Such a leakage has already been incorporated into ANPP Design Bases by providing isolation capabilities, drains, sumps, and HVAC system which minimize the release to the environment.

Based upon this evaluation and compliance with Revision 1 of NRC Regulatory Guide 1.143, the APS Quality Assurance Program continues to satisfy Appendix B of 10CFR50.



AFFECTED PAGES

OF

PVNGS FINAL SAFETY ANALYSIS

REPORT

CONFORMANCE TO NRC
REGULATORY GUIDESRESPONSE

16 | Information contained in Regulatory Guide 1.140 is utilized as discussed in sections 9.4 and 11.3, and in response to Question 9A.38.

REGULATORY GUIDE 1.141: Containment Isolation Provisions for Fluid Systems (Revision 0, April 1978)

RESPONSE

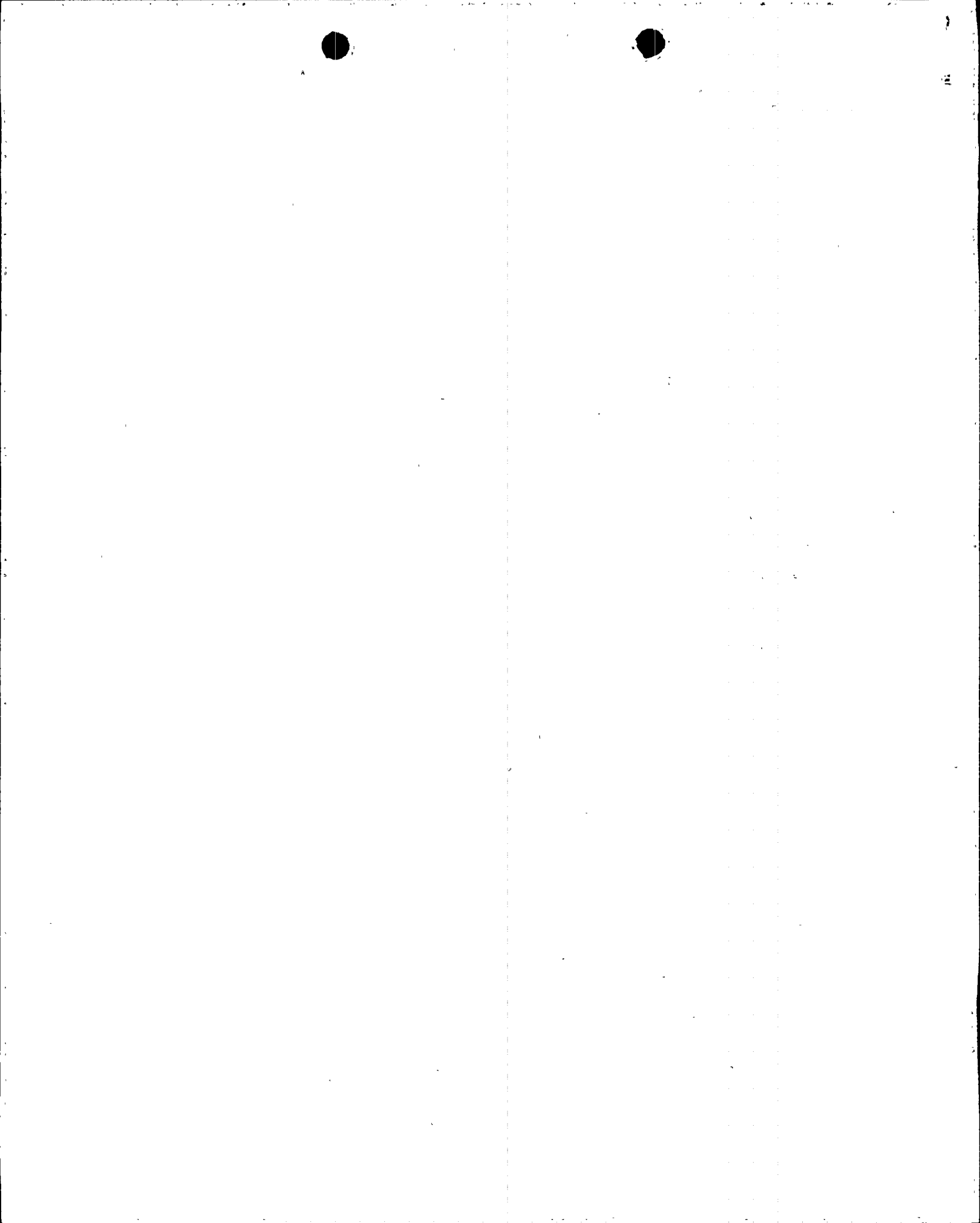
17 | The position of Regulatory Guide 1.141 is accepted (refer to section 6.2.4) except for the following. An exception is taken to Regulatory Guide 1.141 for the CVCS charging line containment isolation valve CHA-HV-524. This valve does not meet the guidance of section 4.2.2 of ANSI N271-1976 which requires all power operated isolation valves to be capable of remote manual actuation from the control room. The power supply for this valve is removed by locking open its breaker at MCC PHA-M3520. The restoration of the power supply requires local operator action at the MCC. This exception to lock open valve CHA-HV-524 ensures that a flowpath is available for charging or auxiliary spray flow by preventing inadvertent operation of the valve.

12 | REGULATORY GUIDE 1.143: Design Guidance for Radioactive Waste Management Systems Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants (Revision 0, July 1978)

RESPONSE

PVNGS accepts the position of Regulatory Guide 1.143 including implementation of quality assurance requirements for the radwaste management systems (Refer to sections 9.3, 11.2, 11.3, 11.4 and 17.2.) with the following exceptions:

14 | INSERT A
B C. Position C, paragraph 1.1.3 - The turbine building, which houses most of the steam generator blowdown system, is a



Insert A.

Position B, (Discussion) - For the purpose of this guide, the radwaste systems do not include instrumentation and sampling systems beyond the first root valve.

