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 JORDAN,E.L. Office for Analysis & Evaluation of Operational Data, Direc

SUBJECT: Forwards response to 890407 request for info re backfits.&
 installation cost.

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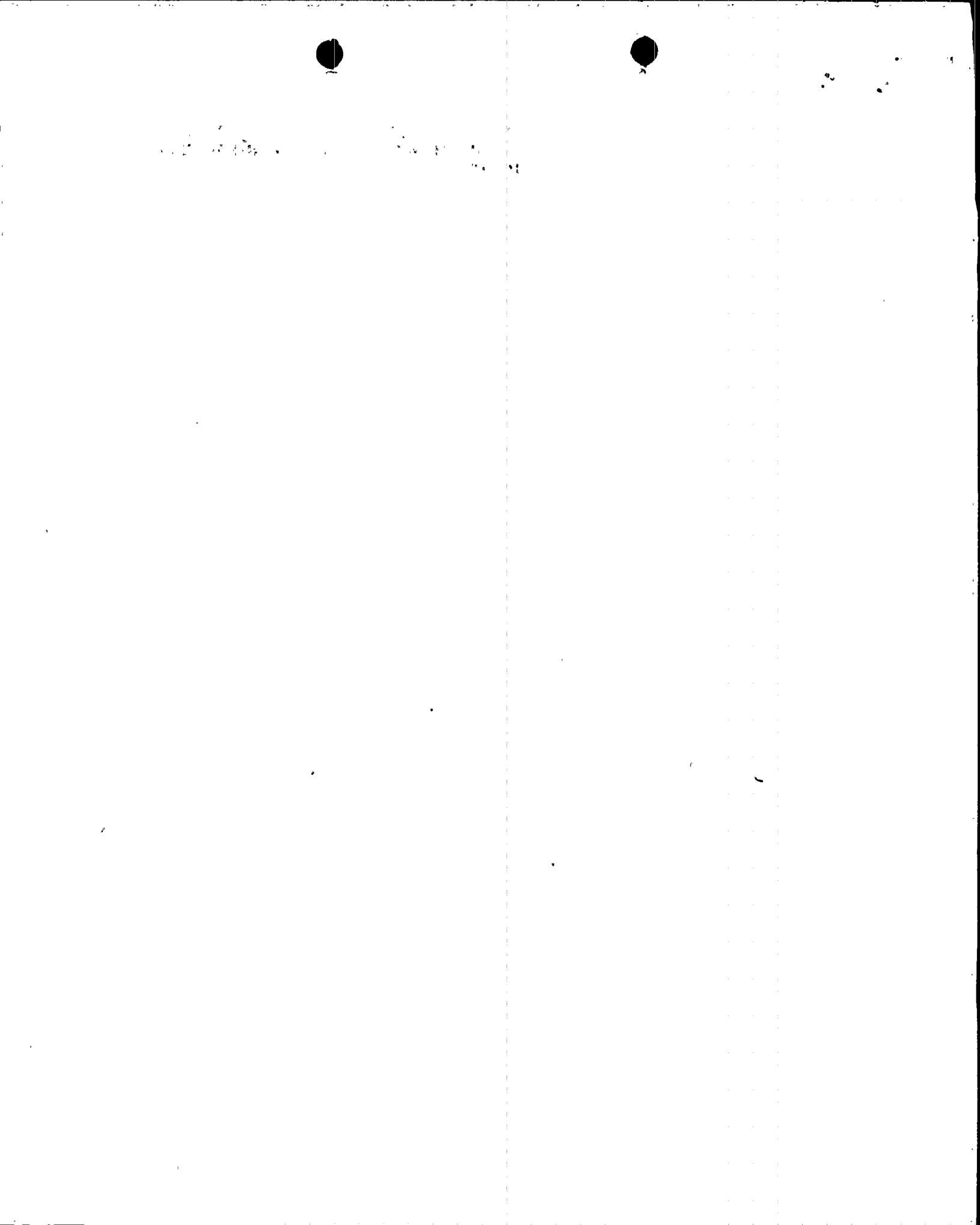
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Arizona Nuclear Power Project

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161-01952-WFC/SKW

May 23, 1989

Edward L. Jordan, Director
Office for Analysis and Evaluation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555


Reference: NRC General Letter Dated April 7, 1989

Dear Sir:

Subject: NRC Request for Information Concerning Backfits
File: 89-056-026

Attached please find ANPP's response to your subject questionnaire along with the requested installation costs. If you have any questions, please contact A. Carter Rogers of my staff at (602) 371-4041.

Very truly yours,


W. F. Conway
Executive Vice President

WFC/SKW/jle

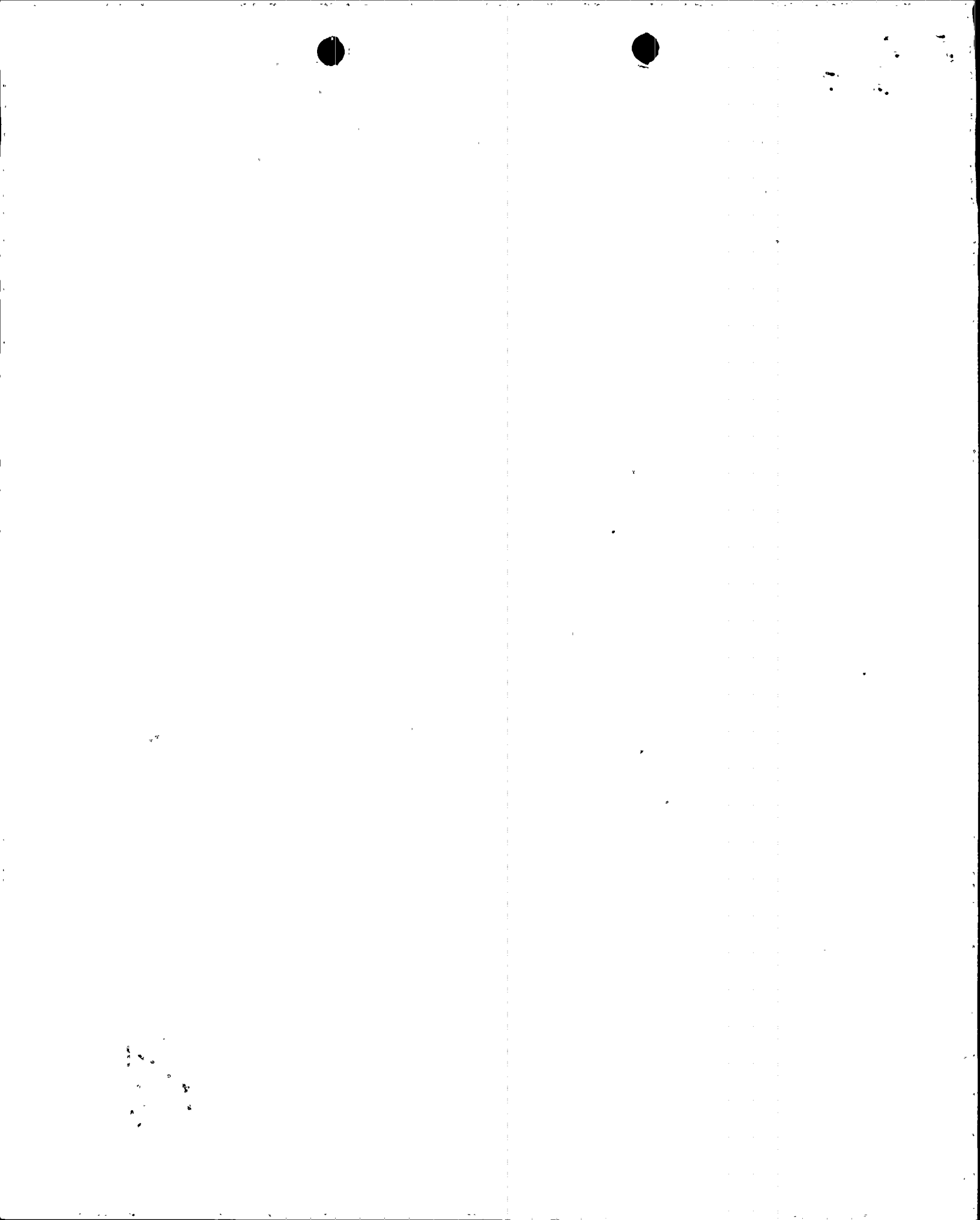
Attachments

cc: G. W. Knighton (all w/attachments)
J. B. Martin
~~T. L. Chan~~
M. L. Davis
T. J. Polich
A. C. Gehr

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Attachment 1

1. Are NRC procedures (i.e., Manual Chapter 0514) sufficiently clear and effective on how backfits are identified and transmitted to licensees, and how claims of backfit and appeals are handled? If not, would you please comment on the need for specific improvement?

ANPP Response

No. Chapter 0514 of NRC Manual specifically allows the use of I&E Bulletins and Generic Letters to impose backfits on utilities. In contrast, Chapter 0720 of the NRC Inspection and Enforcement Manual establishes in Section 03.01, "I&E Bulletins are not intended to substitute for newer revised license conditions or other continuing requirements." An associated footnote states "If a licensee or permit holder refuses to perform an action requested in an I&E Bulletin, a requirement for the action may be imposed by an order, following staff evaluation." Through these statements, the I&E Manual establishes that Bulletins cannot impose requirements. These two procedures provide conflicting information and need to be revised to remove this conflict.

2. Is the NRC staff practice consistent with the Manual Chapter 0514 process in identifying and implementing backfits? If not, would you please comment on any specific observed inconsistencies?

ANPP Response

After review of Palo Verde inspection reports, Generic Letters, I&E Bulletins, and new rules, the NRC staff practices seem to be consistent with the Manual Chapter 0514 process.

3. In the past year have you experienced, in your judgment, the imposition of one or more backfits, which would not fit one of the exceptions listed in 10 CFR 50.109(a)(4) or did not have a regulatory analysis, for which you did not file a claim or appeal? If so, please indicate why you did not file a claim or appeal.

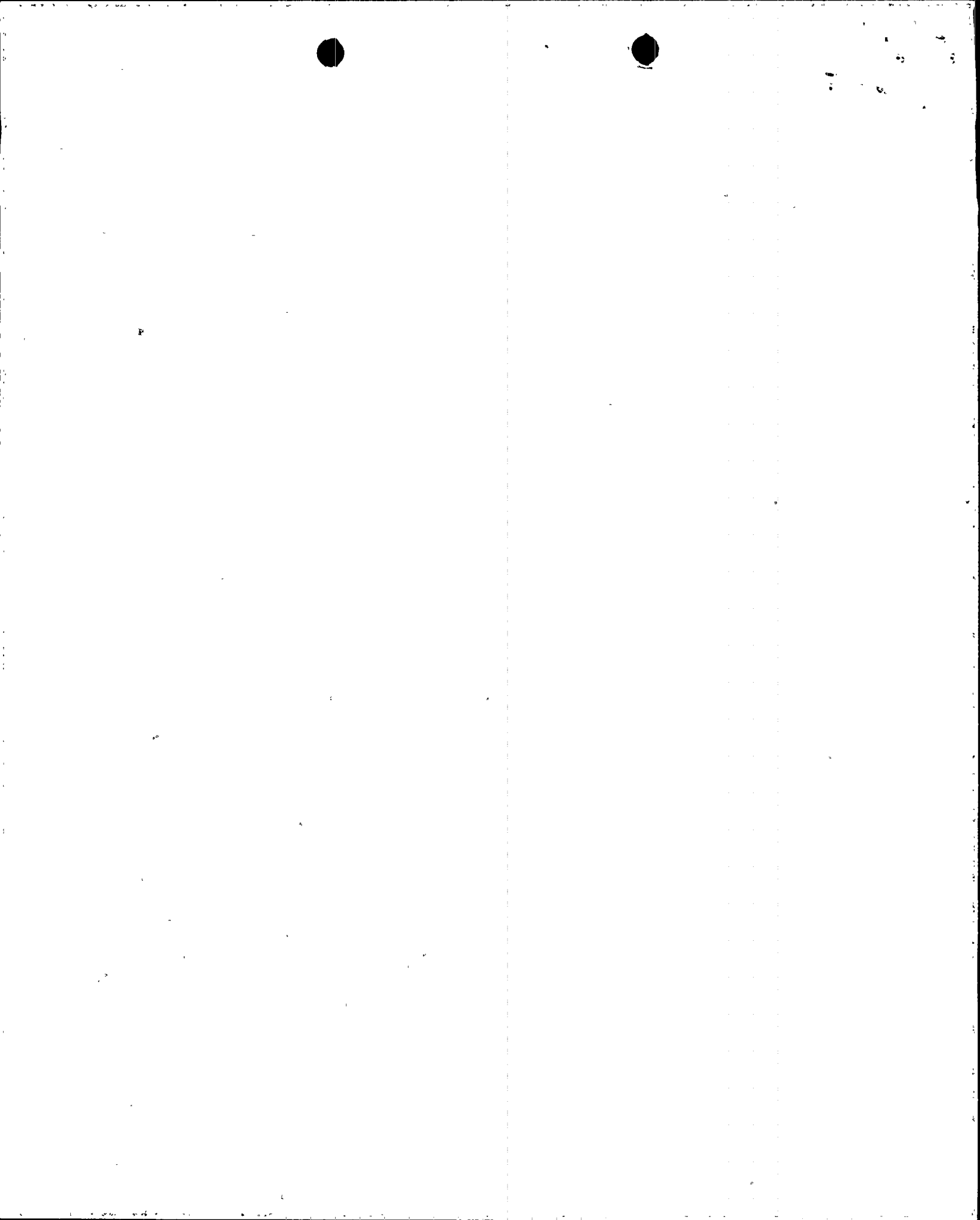
ANPP Response

In the review which was done, no backfit was imposed on Palo Verde which did not fit into one of the exceptions or did not have the regulatory analysis.

4. Please describe any impediments or weaknesses in the backfit process, or in the communications and understanding at that process, and any suggestions for improvements.

ANPP Response

See response to Question 1.



Attachment 2

Bulletin 88-01

This action has not been completed at this time for Palo Verde Units 2 and 3. Parts have been procured at a cost of \$3,145.00 for each Unit and the estimated installation and retest time is 60 manhours per Unit, at a cost of \$1,800.00. The manhours for inspection was 61 manhours per Unit as given in ANPP letter 161-00934-EEVB/JMQ dated April 6, 1988. The inspection cost translates to \$1,830.00. The total cost is estimated to be \$6,775.00 per Unit.

Bulletin 88-02

The response to this Bulletin has not been transmitted to the NRC. The cost information is not yet available.

Bulletin 88-05

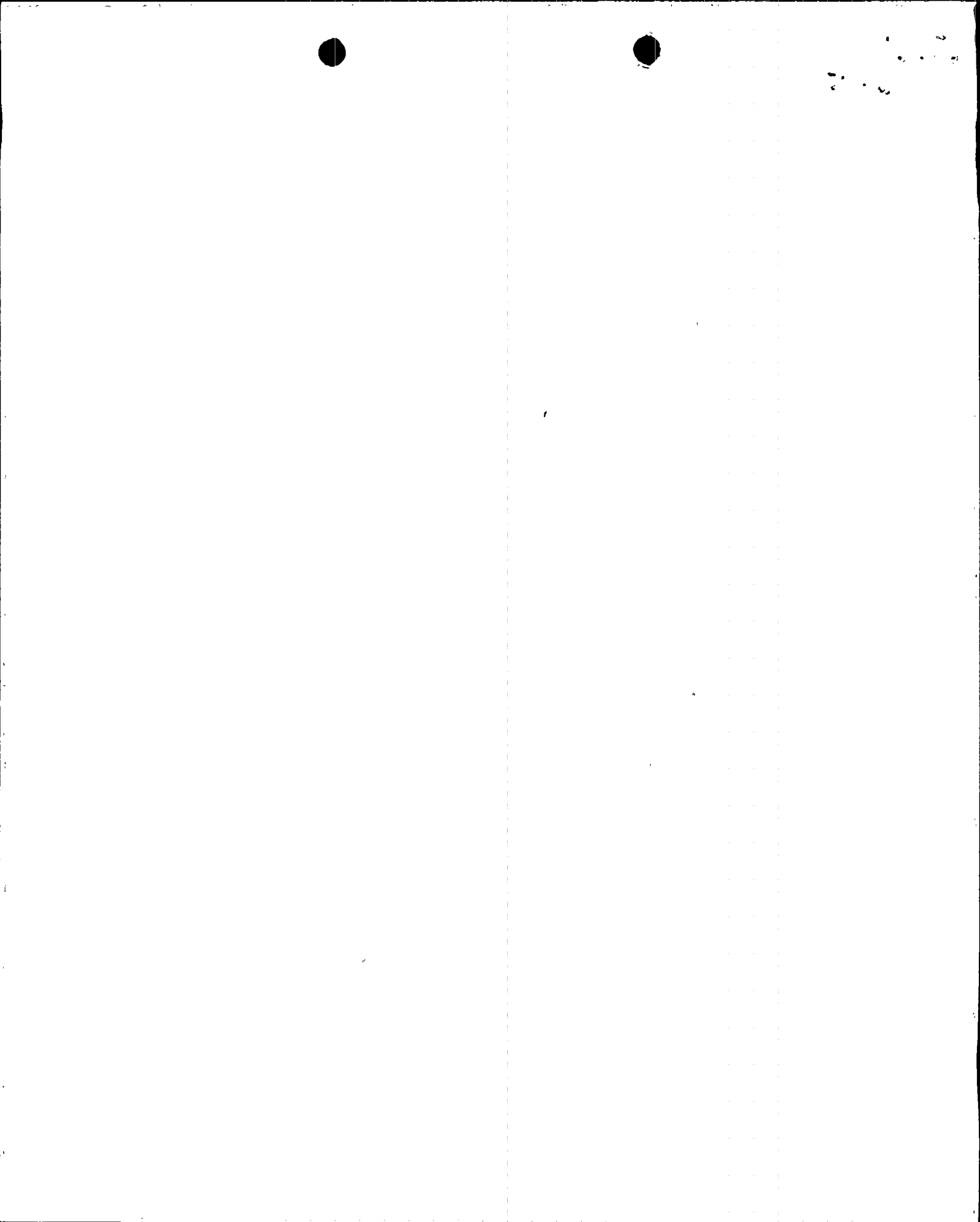
This action required a large effort for both maintenance and engineering staff, however the manhours accumulated on this task were separately recorded and broken down by PVNGS department. The cost breakdown is also attached.

Generic Letter 88-01

This letter deals with Boiling Water Reactor. Palo Verde's units are Pressurized Water Reactors. The costs incurred were minimal.

Generic Letter 88-03

No plant modifications were required for Palo Verde. Engineering spent 35 manhours researching the design of the plant in regards to the issue. This translates to a cost of \$1,050.00.



Attachment 2

TOTAL DOLLARS TO DATE: \$62,984

Department	Unit	Payroll	Contract Labor	Contract Services	Material/Supplies	Travel	Material Load	Total
Licensing	9333	\$ 4,628	\$ 5,016		\$ 763			\$10,407
Vendor Quality	9551	13,570	2,837			\$336		16,743
Procurement	9554	338	152					490
QA Monitoring	9562	1,467						1,467
QA Test Monitoring	9563	199						199
Central Main. W.C.	8534	274						274
Radiation Protection	8551	167						167
Mech/Civil	8624	3,067						3,067
Micrographics	9133	112						112
Train - A/V	9136				1,482		95	1,577
Mech/Chem.	9141	10,436						10,436
Stores	9242		10,898					10,947
Purchasing	9243	7,098		49				7,098
TOTALS		\$41,356	\$18,903	\$49	\$2,245	\$336	\$95	\$62,984

