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 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530

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 MARTIN,J.B. Region 5 (Post 820201) I

SUBJECT: Submits updated info re evaluation of fire protection sys
 equipment schedule for completed selected actions. D

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WILLIAM F. CONWAY
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161-03585-WFC/RAB

November 13, 1990

Mr. John B. Martin
Regional Administrator, Region V
U. S. Nuclear Regulatory Commission
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

- References:
- A) Letter to J. B. Martin, NRC, from W. F. Conway, APS, dated July 20, 1990. Subject: Evaluation of Fire Protection System Equipment (161-03349).
 - B) Letter to J. B. Martin, NRC, from W. F. Conway, APS, dated August 1, 1990. Subject: Response to NRC Inspection Report Nos. 50-528/90-25, 50-529/90-25, 50-530/90-25; Safe Shutdown Emergency Lighting (161-03373).
 - C) Letter to J. B. Martin, NRC, from W. F. Conway, APS, dated August 3, 1990. Subject: Submittal of Emergency Lighting Independent Review - Impell Study (161-03382).

Dear Mr. Martin:

Subject: Palo Verde Nuclear Generating Station (PVNGS)

Unit 1, 2, and 3

Updated Information Related to Evaluation of Fire Protection System
Equipment Schedule for Completed of Selected Actions

File: 90-019-026; 90-056-026

As provided in Reference A, APS informed the NRC in Section VI - Corrective Actions, of its intent to revise the PVNGS Quality Assurance Program requirements for fire protection by November 15, 1990. The purpose of this letter is to advise the NRC that APS will be unable to meet this schedule. Following several weeks of effort to complete an evaluation of the application of quality assurance criteria for fire protection, APS has been unable to meet the interim milestone date of September 30, 1990, mentioned in Reference A. The current schedule indicates this effort will be completed by November 15, 1990, allowing the revised Quality Assurance Program requirements for fire protection to be completed by December 31, 1990.

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Mr. John B. Martin
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Due to the large volume of work required to completely address the open issues, it has become apparent that the effort will require more time than originally estimated. APS began an effort to develop a comprehensive listing of open items and commitments soon after completion of our response to Inspection Report Numbers 50-528/90-25, 50-529/90-25 and 50-530/90-25 as documented in Reference B. The listing of action items was derived, in part, from the following:

- 1) Recent regulatory correspondence (since January, 1990) related to emergency lighting or fire protection,
- 2) several internal documents identifying open questions or concerns related to emergency lighting or fire protection, and
- 3) the ABB/Impell Corporation Emergency Lighting Study Report (Reference C).

Identification of over 200 action items resulted from this review. A number of these items are related to the evaluation of Quality Assurance Program applicability to fire protection system equipment. The effort to address these action items has been estimated to require approximately 20,000 manhours. APS management then established a dedicated, multi-disciplined team with a full-time project manager, as well as consulting assistance from ABB/Impell Corporation. This team was assigned to develop a detailed plan and schedule to address all open action items. The schedule developed by this team indicates that the actions required to evaluate fire protection quality assurance requirements will not be completed until November 15, 1990. These actions will support development of a revised Quality Assurance Program for fire protection by December 31, 1990, for submittal to the NRC for review.

Currently, the multi-disciplined fire protection system review team has completed approximately 20% of the open actions. The actions are being addressed based on their priority to establish quality assurance applicability decisions, resolution of fire protection equipment concerns and closure of open concerns related to application of design criteria. Reviews to date have not indicated any additional operability or safety concerns not previously identified (Reference A). The multi-disciplined review team will address all open items prior to being disbanded. The fact that no additional safety or operability concerns have been identified gives APS confidence that operation under the Justifications for Continued Operation, documented in Reference A, continues to be valid and acceptable.

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Regional Administrator, Region V
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This provides additional confidence that continued operation remains justified. In addition, applicable compensatory measures as identified in Reference A, or subsequently identified, will remain in effect until full compliance with quality assurance program requirements are achieved.

Sincerely,

James H. Levine
for WFC

WFC/RAB/pmm

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