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SUBJECT: Advises of rescheduling of implementation of revised
 emergency operating procedures until Dec 1991 due to major
 simulator upgrade. Activities that will impact licensed
 operator training & preparedness listed. S

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-01946-WFC/TRB/JJN
January 3, 1991

U. S. Nuclear Regulatory Commission
Document Control Desk
Mail Station: P1-37
Washington, DC 20555

Reference: Letter from W. F. Conway, Executive Vice President Nuclear, Arizona Public Service, to U. S. Nuclear Regulatory Commission, dated March 21, 1990.

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1, 2, and 3
Docket No. STN 50-528 (License No. NPF-41)
Docket No. STN 50-529 (License No. NPF-51)
Docket No. STN 50-530 (License No. NPF-74)
Emergency Operating Procedures
File: 91-019-026

As discussed in the referenced letter, APS is in the process of revising the Emergency Operating Procedures (EOPs). Although APS is currently on schedule to implement the revised procedures by September 1991, APS intends to reschedule the effective implementation date of the EOPs to December, 1991. The decision to reschedule the implementation of the EOPs is based on recent industry experiences when implementing new EOPs soon after a major simulator upgrade.

As a result of the simulator upgrade, the following activities must take place which will impact licensed operator training and preparedness:

- Simulator scenarios must be revalidated to identify correct simulator manipulations and responses,
- Licensed instructors and operators must be provided sufficient simulator training and experience to familiarize themselves with the upgraded plant simulation characteristics, and
- Finally, training for newly installed systems/components (e.g., back panels, QSPDS/ERFDADS, plant computer group alarm display, COLSS/CPCs display, RMS capability) must be developed and implemented.

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To implement the new EOPs, the following activities must be accomplished which also impact licensed operator training and preparedness:

- Since the new EOPs are wholly revised, substantial changes to the requalification exam bank are anticipated,
- The simulator scenarios must be developed and validated for the new EOPs, and
- Finally, simulator training and experience using the new EOPs must be provided to attain both operator and examiner proficiency.

Implementing these activities concurrently would require the operators to be intimately conversant with two sets of EOPs and examination material while adjusting to the new simulator response. APS believes this to be an unnecessary burden with modest benefit. Rescheduling the implementation from September 1991 to December 1991 will allow training personnel to properly prepare for the new EOPs and better distribute the demands on the licensed operators over several months.

Should you have any questions regarding this response, please contact me.

Very truly yours,



WFC/TRB/JJN/dmn

cc: J. B. Martin
D. H. Coe
A. C. Gehr
A. H. Gutterman

