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SUBJECT: Forwards Rev 0 to "Operations QA Plan," per 901231 ltr re
 fire protection QA program. Plan reflects complete rewrite &
 reformatting of program currently presented in updated FSAR
 Section 17.2. D S

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 TITLE: 50.54.a.3 & 50.55.f.3 Change to SAR QA Program A

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

161-03847-WFC/GEC

March 29, 1991

Docket Nos. STN 50-528/529/530

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

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS),
Units 1, 2, and 3
Operations Quality Assurance Plan
File: 91-056-026; 91-005-216

Arizona Public Service Company (APS), in accordance with 10 CFR 50.54(a)(3), is submitting this revision to the previously accepted PVNGS quality assurance program description currently included in Section 17.2 of the PVNGS Updated Final Safety Analysis Report (UFSAR). The program revision, titled Operations Quality Assurance Plan and provided as enclosure 1, is being submitted in accordance with the schedule documented in the letter from W. F. Conway (APS) to J. B. Martin (USNRC-Region V), dated December 31, 1990, regarding the Fire Protection Quality Assurance Program.

The revised program description is a stand-alone document and, upon acceptance by the Commission, will supersede all previous Quality Assurance Plans and manuals, and will replace the current UFSAR Section 17.2. UFSAR Section 17.2 will then be revised to reference this Operations Quality Assurance Plan which will be contained in a separate volume.

APS has concluded that the enclosed Operations Quality Assurance Plan satisfies the criteria of Appendix B to 10 CFR Part 50, and encompasses the basic regulatory guides and ANSI standard commitments contained in the present PVNGS UFSAR Section 17.2 with certain clarifications. This conclusion is based upon a thorough review and comparison of the Operations Quality Assurance Plan to both the criteria of Appendix B, 10 CFR Part 50 and selected ANSI standards. A tabulated comparison of the Operations Quality Assurance Plan to the criteria of Appendix B to 10 CFR Part 50 is included in Appendix D to the Plan which is excerpted in enclosure 2. In addition, a tabulated comparison of the Operations Quality Assurance Plan to the acceptance criteria of Standard Review Plan 17.2 is provided in enclosure 3.

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The enclosed Operations Quality Assurance Plan reflects a complete rewrite and reformatting of the program currently presented in UFSAR Section 17.2. The reason for the changes included in enclosure 1 is founded upon a change in APS philosophy associated with the Quality Assurance (QA) Program.

The basic changes include:

1. Orienting the QA Program toward an operating facility.
2. Emphasizing project ownership of the QA Program.
3. Delineating specific responsibilities for line verification activities and defining three specific levels of quality verification.
4. Emphasizing line organization responsibility and accountability with regard to the development, maintenance, and implementation of quality programs and ensuring quality performance.
5. Consolidating programs presently described in UFSAR Section 17.2 and the PVNGS Operations Quality Assurance Criteria Manual into one document.
6. Providing enhanced descriptions and program requirements for five quality augmented programs.
7. Providing specific program requirements for the procurement, installation, design, testing, modification, and use of computer software and data.
8. Incorporating the graded approach concept for the application and verification of QA Program requirements.
9. Providing clarification and updates to selected ANSI standards and NRC regulatory guides.

Information regarding the organizational structure of the Quality Assurance Division, currently located in UFSAR Section 17.2, will be moved to Section 13.1 without modification. This change is editorial in nature and will not reduce the commitments in the program description. This change will be incorporated in the next regular revision of the PVNGS UFSAR following Commission acceptance of the Operations Quality Assurance Plan. In addition, the information contained in Part II of Appendix B to the Operations Quality Assurance Plan will be incorporated into the PVNGS UFSAR in Section 1.8 following Commission acceptance of the Operations Quality Assurance Plan.

The PVNGS Technical Specifications for each Unit will require a change in the Administrative Controls section to replace the current reference to the Operations Quality Assurance Criteria Manual with a reference to the Operations Quality Assurance Plan. This Technical Specification change will be submitted following Commission acceptance of the Plan.

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APS requests that the Operations Quality Assurance Plan become effective 90 days following Commission acceptance to allow adequate time to ensure implementing procedures are in place.

As documented in the letter from W. F. Conway (APS) to J. B. Martin (USNRC-Region V), dated December 31, 1990, regarding the Fire Protection Quality Assurance Program, a copy of the Quality Assurance Program for Fire Protection (Appendix F-1 to the Operations Quality Assurance Plan) is enclosed to highlight those changes made to the program description during the review process. The copy is included as enclosure 4, and the changes are identified by the lining out of the deletions and bolding of the insertions.

If you have any questions or require further information, please contact Gary E. Clyde at (602) 340-4252.

Sincerely,



WFC/GEC/gec

Enclosures

cc: J. B. Martin (all w/enclosures)
D. H. Coe
A. C. Gehr
A. H. Gutterman

