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AUTH. NAME AUTHOR AFFILIATION  
 CONWAY, W.F. Arizona Public Service Co. (formerly Arizona Nuclear Power R  
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SUBJECT: Discusses rescheduling of emergency operating procedure  
 upgrade program to 920601, per 911106 mgt meeting in Region V D  
 ofc. Final training on new EOPs will be conducted on S  
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EXECUTIVE VICE PRESIDENT  
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102-02083-WFC/TRB/PJC

November 27, 1991

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
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Reference: Letter No. 102-01946-WFC/TRB/JJN, dated January 3, 1991, from  
W. F. Conway, Executive Vice President, Nuclear, Arizona Public  
Service Company to U. S. Nuclear Regulatory Commission, Document  
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Gentlemen:

SUBJECT: PALO VERDE NUCLEAR GENERATING STATION (PVNGS)  
UNITS 1, 2, AND 3  
EMERGENCY OPERATING PROCEDURES  
File: 91-056-026

On November 6, 1991, representatives of APS and NRC held a management meeting at the NRC Region V offices in Walnut Creek, California. During the course of the meeting, APS discussed the Emergency Operating Procedure (EOP) Upgrade Project and the need to reschedule the implementation date for the upgraded EOPs to June 1, 1992.

The upgraded procedures improve readability, useability, and provide more specific direction for actions. Initial training on the upgraded EOPs resulted in numerous comments and questions from Operations personnel, including the suggestion that additional time for training would be beneficial. The extended schedule will enable APS to evaluate and resolve operator comments prior to final training and to ensure sufficient training time is provided. The revised schedule for completion of the EOP Upgrade Project is provided as Attachment 1.

As indicated in the revised schedule, the evaluation and incorporation of operator comments will continue through the present requalification training cycle (NLR08, 11/12/91 - 1/10/92). Once operator comments have been incorporated, the upgraded EOPs will be revalidated. Upon completion of the revalidation, the new EOPs will be submitted for the required review and approval process which includes the Procedure

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Review Group (PRG). Final training on the new EOPs will be conducted during training cycles NLR10 (2/27/92 - 3/30/92) and NLR11 (3/30/92 - 5/11/92). Approximately three weeks will be available for final comment resolution and any needed additional training prior to the June 1, 1992, implementation date.

Operations management evaluated the concern that the training process being used for the upgraded EOPs could potentially compromise the ability of operating crews to implement the current EOPs. It was found that the operators are well-versed in the current EOPs and are well aware that the current EOPs are still in effect. Additionally, since the new EOPs are primarily a philosophy change, as opposed to a revision in strategy, the new EOPs do not cause the operators to take different actions from the present EOPs. However, to preclude any possible confusion, training that will identify the differences between the current and the upgraded EOPs will be conducted during the present training cycle (NLR08), and during the 1992 cycles, as deemed necessary, until the new EOPs are ready for implementation.

As a further measure to effect a smooth transition to the new EOPs, a task team, composed of members from several APS organizations, was formed to evaluate the current and upgraded EOPs to ensure that the concepts and methods for maintaining safety system functions remain essentially unchanged. The evaluation is targeted for completion by the end of 1991. Quality Assurance will monitor both this evaluation and the overall EOP transition process.

Should you have any questions concerning the revised EOP schedule, please contact me.

Very truly yours,



Attachment  
WFC/TRB/PJC/dmn

cc: J. B. Martin  
D. H. Coe



ATTACHMENT 1

REVISED EOP UPGRADE COMPLETION SCHEDULE

Milestones	Project Task
11/12/91 - 1/10/92	Continue evaluation and incorporation of operator comments on revised EOPs. Begin initial operator training on new Functional Recovery Procedure.
01/10/92 - 2/17/92	Revalidate revised Emergency Operations (EO) and Recovery Operations (RO) procedures. Submit for Procedure Review Group review and approval.
02/1/92 - 3/30/92	Train operators on approved (new) EOs and ROs. Revalidate revised Functional Recovery Procedure. Submit for Procedure Review Group review and approval.
03/30/92 - 5/11/92	Train operators on approved (new) Functional Recovery Procedure. Evaluate operators on approved (new) EOPs.
05/11/92 - 5/30/92	Final comment resolution and contingency training.
06/01/92	Implement new EOPs.

