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 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Discusses plans to reschedule implementation of upgraded D
 Emergency Operating Procedures to 920817, per 920424 telcon
 w/NRC. Advises that result of efforts will be Rev 0.2 to new S
 EOPS. ,

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-02151-WFC/TRB/PJC
May 19, 1992

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Mail Station: P1-37
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Reference: Letter No. 102-02083-WFC/TRB/PJC, dated November 27, 1991, from
W. F. Conway, Executive Vice President, Nuclear, Arizona Public Service
Company to the U. S. Nuclear Regulatory Commission, Document Control
Desk

Gentlemen:

Subject: PALO VERDE NUCLEAR GENERATING STATION (PVNGS)
UNITS 1, 2, AND 3
EMERGENCY OPERATING PROCEDURES
File: 92-056-026

During a telephone conference call among representatives of Arizona Public Service Company (APS) and the NRC on April 24, 1992, APS discussed plans to reschedule implementation of PVNGS' upgraded Emergency Operating Procedures (EOPs) to August 17, 1992. This revised implementation date is necessary for APS to evaluate, resolve, and incorporate, as appropriate, the comments and recommendations which resulted from the NRC's April, 1992, team inspection of the newly upgraded, but as yet unimplemented, EOPs.

The Inspection Team identified six (6) tasks which APS agreed to complete prior to implementation of the new EOPs. Five of these tasks necessitate procedure changes. The remaining task entails the evaluation and disposition of Combustion Engineering's (CE) comments on the emergency procedure technical guidelines (EPTGs) and the incorporation of safety significant comments if any. In addition, the NRC Inspection Team recommended that APS perform a second Validation and Verification (V&V) of the new EOPs on a sample basis to ensure any other potential problems are promptly identified and resolved.

APS reviewed the projected effort and determined that an additional five (5) weeks, June 1 to July 6, 1992, are needed to complete the procedure changes, the V&V sample, and the evaluation and disposition of CE's comments on the EPTGs. The result of these efforts will be revision 0.2 of the new EOPs. Then, six (6) weeks (training cycle NLR-13 from July 6 to August 14, 1992) are needed to train operators on this subsequent

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revision. As discussed in the referenced letter, operator proficiency on the current EOPs is being maintained and will continue to be maintained until the upgraded procedures are made effective August 17, 1992.

In light of the extended implementation schedule, Quality Assurance (QA) intensified its monitoring of the EOP upgrade process. In particular, QA Monitoring personnel participated in the in-plant V&V sample of the new EOPs and will maintain their efforts in monitoring EOP simulator training. QA also plans to monitor the requalification training cycle. Heightened QA involvement will continue until the new EOPs are successfully implemented.

Should you have any questions concerning these changes to the EOP implementation schedule, please contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. J. Murray".

WFC/TRB/PJC/dmn

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

