

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9206020101 DOC.DATE: 92/05/27 NOTARIZED: NO DOCKET #
 FACIL:STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528
 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530

AUTH.NAME AUTHOR AFFILIATION
 LEVINE,J.M. Arizona Public Service Co. (formerly Arizona Nuclear Power R
 RECIP.NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk) I

SUBJECT: Discusses impact of EOP implementation schedule on 1992 NRC D
 initial license exam scheduled on 920601-12,per 920519
 telcon.EOP training will be completed on 920814 & new EOPs, S
 w/NRC recommendations,will be implemented on 920817.

DISTRIBUTION CODE: A003D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 6 /
 TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737(Generic Ltr 82-33) A

NOTES:STANDARDIZED PLANT 05000528
 Standardized plant. 05000529 D
 Standardized plant. 05000530 D

	RECIPIENT		COPIES			RECIPIENT		COPIES		
	ID CODE/NAME		LTTR	ENCL		ID CODE/NAME		LTTR	ENCL	
	PD5 LA		1	1		PD5 PD		1	1	
	TRAMMELL,C		2	2		THOMPSON,M		2	2	
INTERNAL:	NRR/DLPQ/LHFB11		1	1		OC/LFMB		1	0	
	<u>REG FILE</u> 01		1	1		RES/DSIR/EIB		1	1	
EXTERNAL:	NRC PDR		1	1		NSIC		1	1	

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 12 ENCL 11

R
I
D
S
/
A
D
D
S

Arizona Public Service Company

PALO VERDE NUCLEAR GENERATING STATION
P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

102-02155-JML/TRB/PJC

May 27, 1992

JAMES M. LEVINE
VICE PRESIDENT
NUCLEAR PRODUCTION

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

Reference: Letter No. 102-02151-WFC/TRB/PJC, dated May 19, 1992, from
W. F. Conway, Executive Vice President, Nuclear, Arizona Public Service,
to the Document Control Desk, U. S. Nuclear Regulatory Commission

Gentlemen:

**SUBJECT: PALO VERDE NUCLEAR GENERATING STATION
UNITS 1, 2, AND 3
DOCKET NOS. 50-528, 529, 530
IMPACT OF EMERGENCY OPERATING
PROCEDURE IMPLEMENTATION SCHEDULE
ON 1992 INITIAL LICENSE EXAMINATION
File: 92-070-026**

During a telephone conversation on May 19, 1992, between T. R. Meadows, NRC Region V, and E. G. Firth, Arizona Public Service Company (APS), the NRC asked that APS confirm its assessment of the potential impact of the revised implementation schedule for Palo Verde's (PVNGS) Emergency Operating Procedures (EOPs) upon the upcoming NRC initial license examination. The examination for PVNGS' license candidates is scheduled for June 1-12, 1992, and, as discussed in the referenced letter, APS has rescheduled implementation of the new EOPs to August 17, 1992.

PVNGS' license candidates have been trained on the currently approved, but unimplemented, Revision 0.1 of the new EOPs. The candidates have a thorough understanding of the new EOPs and are sufficiently trained on the Revision 0.1 procedures to use them during the examination to demonstrate their ability to function under emergency operating conditions.

At present, APS is incorporating comments and recommendations from the NRC's April, 1992, EOP team inspection. The result will be Revision 0.2 which will be made effective in mid-August. Although there are differences between Revisions 0.1 and 0.2, there are no changes to the overall structure, strategies, or directions for use of the EOPs. A general description of the changes from Revision 0.1 to 0.2 is provided for your review in Attachment 1.

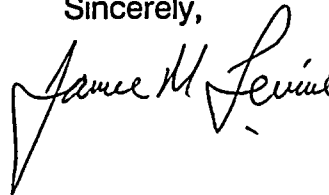
9206020101 920527
PDR ADDCK 05000528
F PDR

A003
11

Following the initial examination in June and approval of Revision 0.2 in early July, the license candidates will be enrolled in requalification training cycle NLR-13 beginning July 6, 1992, along with the licensed operators for instruction on the revised EOPs. This training cycle will provide a smooth transition to the Revision 0.2 procedures for both the candidates and the licensed operators. EOP training will be completed on August 14, 1992, and the new EOPs, with NRC comments and recommendations satisfied, will be implemented on August 17, 1992.

APS recognizes there is some element of risk in proceeding with the examination prior to EOP implementation, and we would welcome NRC comments concerning the differences between EOP Revisions 0.1 and 0.2 following your review of Attachment 1. It is our understanding that the licenses of the successful initial license candidates will be held in abeyance pending completion of EOP training and implementation. While we are sensitive to the potential concerns, APS is confident that its license candidates are prepared to participate in the examination process as planned.

Sincerely,

A handwritten signature in cursive script, appearing to read "James M. Levine". The signature is written in dark ink and is positioned below the word "Sincerely,".

JML/TRB/PJC/dmn

Attachment

cc: W. F. Conway
J. B. Martin
D. H. Coe

ATTACHMENT 1

PVNGS EMERGENCY OPERATING PROCEDURES

CHANGES FROM REVISION 0.1 TO REVISION 0.2

A. Changes Which Resulted from EO/RO Training in Spring of 1992

1. Reactivity control safety function status check has been changed to allow reactivity control to be satisfied without all Control Element Assemblies (CEAs) inserted, so long as reactor power is low and not increasing. This is per CEN-152 requirements.
2. Incorporated closing the Low Pressure Safety Injection (LPSI) valves when the LPSI pumps are being stopped. Incorporated a note to advise the operator of the Tech Spec surveillance requirements following operation of the LPSI injection valves.
3. Pressure control checks (Reactor Coolant System (RCS) pressure and temperature within limits) have been made consistent between appropriate recovery operating procedures. This brings these checks into accord with CEN-152 requirements.
4. Changed the feed flow decision table to reflect correct flow rates from EER 91-AF-025. Also refined decision table to show required flow to one or two Steam Generators (SG).
5. Changed method for ensuring adequate Shutdown Margin (SDM) is maintained. The method uses the SDM surveillance test to determine if SDM is met. If SDM is not met, the Shift Technical Advisor (STA) determines if adequate boration will occur during the cooldown.
6. Provided additional direction for the use of auxiliary spray. Options are provided depending on the number of charging pumps running.
7. Resequenced monitoring of containment sump level vs. RWT level before Recirculation Actuation Signal (RAS) actuates following a LOCA, to ensure adequate suction for Containment Spray (CS) and High Pressure Safety Injection (HPSI) pumps. It is now earlier in the procedure.
8. Modified the SG isolation strategy for a steam generator tube rupture (SGTR) to keep the Main Steam Isolation Valves (MSIVs) open on the ruptured SG until the RCS has been cooled below the isolation temperature when condenser vacuum is available.

PVNGS

EOP Changes - Revision 0.1 to Revision 0.2

Page 2

9. Provided direction to use an Atmospheric Dump Valve (ADV) to maintain isolated SG pressure below 1200 psia during an SGTR.
10. Reworded the step to ensure that Pressurizer (PZR) pressure is below 1225 psia when the RCS is cooled below 520°F during an SGTR.
11. Added a step for restart of a charging pump during a Loss of Offsite Power (LOOP).
12. Provided method for monitoring Instrument Air (IA) pressure locally during a Loss of Offsite Power or Blackout.
13. Resequenced steps to re-energize class buses from offsite power in the LOOP procedure.
14. Deleted NAN-S04 de-energized from entry conditions of the Blackout procedure.
15. Added steps to coordinate the breaker line-ups in the event of a multi-unit blackout.
16. Control Room Supervisor (CRS) & Primary Operator (PO) Safety Function Flowcharts -- Deleted decision block on PZR pressure being less than both SG pressures.

B. Changes Which Resulted from the NRC Audit

1. Change CRS' Safety Function Flowchart to check all safety functions during a blackout.
2. Added containment temperature checks to the Secondary Operator's flowchart.
3. Change LOCA procedure to provide an early, prompt cooldown for unisolated leaks.
4. Add harsh containment limits to all of the applicable setpoints and parameters in the EOPs.
5. Allow the use of containment pressure as a determinant of harsh containment conditions.

6. Correct the ranges shown for Reactor Coolant Pump (RCP) amps.
7. Add a step to record which breakers are opened at local distribution panels during procedures to regain power to electrical panels.
8. Provide directions that will enable one person to locally operate the auxiliary feed pump turbine.
9. Corrected method for pressurizing the condensate header in the Loss of All Feedwater procedure.
10. Changed EOPs to have component names and identifications match plant labels.
11. Added criteria for stopping containment spray pumps to all procedures in which a Safety Injection Actuation Signal (SIAS) may occur.
12. Change the Loss of All Feedwater to include a method to restart the main feed pumps if they are available.
13. Add a step to the applicable appendices of the Functional Recovery Procedure to stop RCPs when a loss of feedwater has occurred.
14. Change the procedure for recovering the diesel generator to correct the method of monitoring diesel air start receiver pressure.
15. Miscellaneous changes - typos, a note before the wrong step, an improperly constructed logic statement, an incorrect cross-reference, inconsistencies between the CRS' and RO's procedures and others.

C. Changes Which Resulted from the Sample Verification and Validation

1. Added amplifying information to some Notes and Cautions.
2. Changed similar steps to be consistent within procedures and between procedures.
3. Changed some EOP steps to be consistent with similar steps in current operating procedures.
4. Corrected format errors to conform with the Writer's Guide.

5. Corrected additional labelling errors.
6. Corrected numbering errors in the procedures (equipment IDs and cross-references).

D. Conclusion

There are no changes to the overall structure, strategies, or directions for use of the EOPs.

- Some changes are broad, e.g., re-doing Control Room and in-plant labels, but are simple for the operator to accommodate without added training.
- Some changes include additional tasks, e.g., using the main feed pump as an alternate method to restore feed in the Loss of All Feedwater procedure. Both the candidates and the presently licensed operators will receive instruction on these tasks during requalification training cycle NLR-13 from July 6 through August 14, 1992.
- Some changes incorporate new limits in familiar steps (e.g., feedflow limits changed to specify one or two steam generators, and boration for shutdown margin no longer uses a 'one-size-fits-all' boration volume), but the bases and intent of the steps are unchanged.

The examinees were the ones who identified many of the items that resulted in the changes described above in Section A, 'Changes from EO/RO Training in Spring of 1992'. These individuals have a thorough understanding of the new procedures and were able to identify many of the inconsistencies and other problems that are being corrected in Revision 0.2.