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SUBJECT: Forwards responses to questions re Amend 1 of PVNGS, units 1, 2 & 3 QA plan.

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**Arizona Public Service Company**

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102-02661-WFC/RAB/GAM

September 28, 1993

WILLIAM F. CONWAY  
EXECUTIVE VICE PRESIDENT  
NUCLEAR

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail station P1-37  
Washington, D.C. 20555

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. 50-528/529/530  
Responses to NRC Questions on the  
Operations Quality Assurance Plan, Amendment 1  
File: 93-005-216**

In a letter dated June 25, 1993, the NRC Region V Staff requested that Arizona Public Service Company (APS) provide responses to questions concerning Amendment 1 of the Palo Verde Nuclear Generating Station Operations Quality Assurance Plan. Responses to those questions are provided in Enclosure 1.

APS intends to include the Operations Quality Assurance Plan in Section 17.2 of the Updated Final Safety Analysis Report (UFSAR). The next submittal of changes to the Quality Assurance Plan that do not reduce commitments will be included with Revision 6 of the UFSAR, to be submitted by March 25, 1994.

Should you have any questions, please contact Richard A. Bernier at (602) 393-5882.

Sincerely,



WFC/RAB/GAM/bcf

Enclosure

040085

cc: K. E. Perkins, Jr.  
B. H. Faulkenberry  
J. A. Sloan

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**ENCLOSURE 1**

**RESPONSES TO NRC REGION V QUESTIONS REGARDING  
THE PALO VERDE NUCLEAR GENERATING STATION  
UPDATED QUALITY ASSURANCE PLAN, AMENDMENT 1**

1. Quality Assurance Program Approval

The approval signatures of the Director of Quality Assurance (QA), and of the Executive Vice President, Nuclear, have been deleted in Amendment 1 to the QA Plan. As a consequence, it is no longer evident who approved the plan nor that senior level management is endorsing the QA Plan, a top tier QA document.

Is the QA Plan approved by the Director of Quality Assurance and the Executive Vice President, Nuclear? Whose "Policy Statement" is contained in page 1 of the QA plan?

**Response:**

The PVNGS Operations Quality Assurance (QA) Plan was approved by the QA Director and Executive Vice President, Nuclear. Changes to the QA Plan are controlled by administrative procedures which require approval by the QA Director and the Executive Vice President, Nuclear. Further, QA Plan changes are transmitted to the Nuclear Regulatory Commission (NRC) from the Executive Vice President, Nuclear, with the certification required by 10 CFR 50.71.

The QA policy statement on page 1 of the QA Plan (a licensing basis document) states in part, "The Executive Vice President, Nuclear, has directed the establishment of a formal and comprehensive quality assurance program at PVNGS.... Conflicts involving implementation of the requirements of the Quality Assurance Program shall be resolved by the Director, Quality Assurance, or, if deemed necessary, the Executive Vice President, Nuclear."

Based on the above, APS does not intend to revise the QA Plan to include signatures on the Policy Statement. However, APS does believe there is value in raising the visibility of the QA Policy Statement, and therefore a copy of the Policy Statement, signed by the Executive Vice President, Nuclear, and the Director, Quality Assurance, has been transmitted to each PVNGS employee.

2. Quality Assurance Plan / Technical Specifications consistency

Section 2.9.3, Amendment 1, page 19, last sentence states, in part, that "Independent Safety Engineering reports of evaluations and assessments shall be prepared, approved, and transmitted to the Director, Quality Assurance..." Technical Specification (TS) 6.2.3.4 requires the Independent Safety Engineering Department (ISE) to make detailed recommendations to the Director, Nuclear Safety. The current approved QA Plan has ISE reporting to the Director, Nuclear Safety. Amendment 1 moves ISE to the QA Department. Appendix "C", Terms and Definitions, of Amendment 1 contains a definition of ISE that does not accurately reflect the ISE functions required by TS 6.2.3.1.

Has the TS been reviewed to determine what requirements are being affected by Amendment 1 and to determine if a TS change is required? Has a TS change request been submitted to the NRC on this subject?

**Response:**

The PVNGS Technical Specification (TS) requirements for the Independent Safety Engineering Department (ISE) were reviewed during the preparation of Amendment 1 of the QA Plan. This review was documented in conjunction with the safety evaluation performed for the QA Plan changes in accordance with administrative control procedures. Based on the safety evaluation, no TS changes are required.

TS 6.2.3.4 states:

"The ISE Department shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving plant safety to the Director, Nuclear Safety, or designated alternate, Plant Manager, and the Chairman, Offsite Safety Review Committee (OSRC)."

The TSs do not specify the reporting hierarchy for the ISE. Amendment 1 of the QA Plan reflects the current reporting hierarchy for the ISE and is consistent with the reporting relationship identified in the Updated Final Safety Analysis Report section 13.1. Detailed recommendations of the ISE are provided to the Director, Nuclear Safety, Plant Manager, and the Chairman, OSRC, as required by TS 6.2.3.1.