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BERT C. SIMPSON
VICE PRESIDENT
NUCLEAR SUPPORT

102-03101-ECS/AKK/RJH
September 1, 1994

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
Docket Nos. STN 50-528/529/530
1994 Emergency Plan Exercise Objectives
File: 94-002-493; 94-056-026

Palo Verde Nuclear Generating Station (PVNGS) is committed to demonstrating major elements of its Emergency Plan on a periodic basis. One of the elements requiring demonstration in 1994 involves an unannounced off-hours activation of Emergency Response Facilities within the time frame specified in the PVNGS Emergency Plan. As a result of the March 14, 1993, Unit 2 ALERT, due to a ruptured steam generator tube and the subsequent Emergency Response Facility activation, PVNGS considers the objective adequately demonstrated. Therefore, it will not be a part of the 1994 Exercise.

Following the ALERT declaration at 0502 on Sunday, March 14, 1993, the Emergency Operations Facility (EOF) and the Technical Support Center (TSC) were staffed and activated in 1 hour and 40 minutes, and 1 hour and 43 minutes respectively. These activation times meet the current PVNGS Emergency Plan goal of staffing and activating the EOF/TSC within 1-2 hours of event declaration which occurs outside of normal day shift work hours. Full details of the Steam Generator Tube Rupture (SGTR) event are contained in the NRC Augmented Inspection Team (AIT) Report 50-529/93-14.

Immediately following termination of the ALERT, PVNGS conducted a comprehensive detailed analysis and investigation of events that surrounded the SGTR including a detailed critique of emergency preparedness. Subsequent to the report, Emergency Planning resolved each emergency preparedness deficiency. The investigation conclusions and corrective action assignments are fully detailed in PVNGS Incident Investigation Report IIR 2-3-0112.

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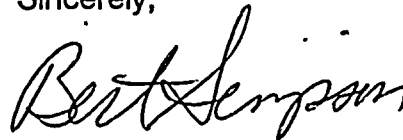
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Prior to this event, the State of Arizona and Maricopa County received credit from Federal Emergency Management Agency (FEMA) Region IX for successfully demonstrating unannounced off-hours facility activation based on their response to the May 4-6, 1992, ALERT at PVNGS. In discussions held with representatives from the State and County on June 10, 1994, neither organization sees a need to additionally demonstrate their ability to respond to an unannounced off-hours event as part of a training exercise during 1994. Since the State and County participate in each annual Exercise, an objective to conduct an unannounced off-hours activation would result in an unwarranted expenditure of funds to support PVNGS.

In summary, PVNGS considers this objective as successfully demonstrated during the March 14, 1993, ALERT. Therefore, the commitment to demonstrate unannounced off-hours Emergency Response Facility activation as one of the major elements of the Emergency Plan has been met.

Should you have any questions, please call Burton Grabo at (602) 393-6492.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bert Simpson".

ECS/AKK/RJH/rv

cc: B. E. Holian
L. J. Callan
K. E. Perkins
K. E. Johnston
B. Murray
E. F. Bates

