

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SUBJECT: Submits revised section of response to violation noted in
insp rept 50-528/98-03 entitled "Corrective Steps That Will
Be Taken to Avoid Further Violations" read as listed.

NOTES: STANDARDIZED PLANT

05000528^{EF}

NOTE TO ALL "RIDS" RECIPIENTS:

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Palo Verde Nuclear
Generating Station

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102-04187-JML/AKK/DLK
September 27, 1998

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station: P1-37
Washington, DC 20555-0001

Reference: Letter 102-04140, dated June 25, 1998 from J. M. Levine, APS, to
USNRC, "Reply to Notices of Violation 50-528/98-03-03 and 50-528/98-
03-04."

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Docket Nos. STN 50-528
Revision to Reply to Notice of Violation 50-528/98-03-04

Arizona Public Service Company (APS) is revising a commitment made in reply to Notice of Violation 50-528/98-03-04. The referenced letter contained a commitment to revise the "Spent Fuel Handling Machine" procedure to include a limitation that no irradiated fuel be moved in the spent fuel pool unless water level in the fuel transfer canal is equalized with the spent fuel pool. While the commitment was met, the procedural limitation is overly restrictive and would result in an undue burden on the operating crews. Engineering personnel were able to provide more operational flexibility by defining an exclusion zone in the spent fuel pool and establishing administrative controls necessary to limit dose rates on the Operating Deck near the transfer canal gate. An exclusion zone is a defined area within which movement of irradiated fuel is prohibited when water level in the fuel transfer canal is not equalized with the spent fuel pool. APS is revising the section of the Reply to Notice of Violation 50-528/98-03-04 titled "Corrective Steps That Will Be Taken To Avoid Further Violations" to read as follows:

"An exclusion zone in the spent fuel pool and appropriate administrative controls will be established to limit dose rates near the gate when water level in the transfer canal is less than the water level in the spent fuel pool and irradiated fuel is being moved. The exclusion zone and administrative controls will be incorporated into appropriate procedures prior to moving spent fuel during refueling outage 3R7."

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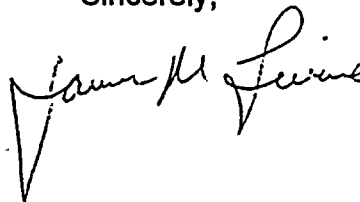
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Additionally, APS is revising the section titled "Date When Full Compliance Will Be Achieved" to read as follows:

"Full compliance was achieved on September 16, 1998 when the exclusion zone and administrative controls were incorporated into appropriate procedures."

Should you have any questions, please contact Ms. Angela K. Krainik at (602) 393-5421.

Sincerely,

A handwritten signature in cursive script, appearing to read "Victor M. Levine".

JML/AKK/DLK/rjh

cc: E. W. Merschoff
M. B. Fields
J. H. Moorman

