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SUBJECT: Provides response to NRC GL 98-01, Suppl 1, "Y2K Readiness
of Computer Sys at nuclear Power Plants."

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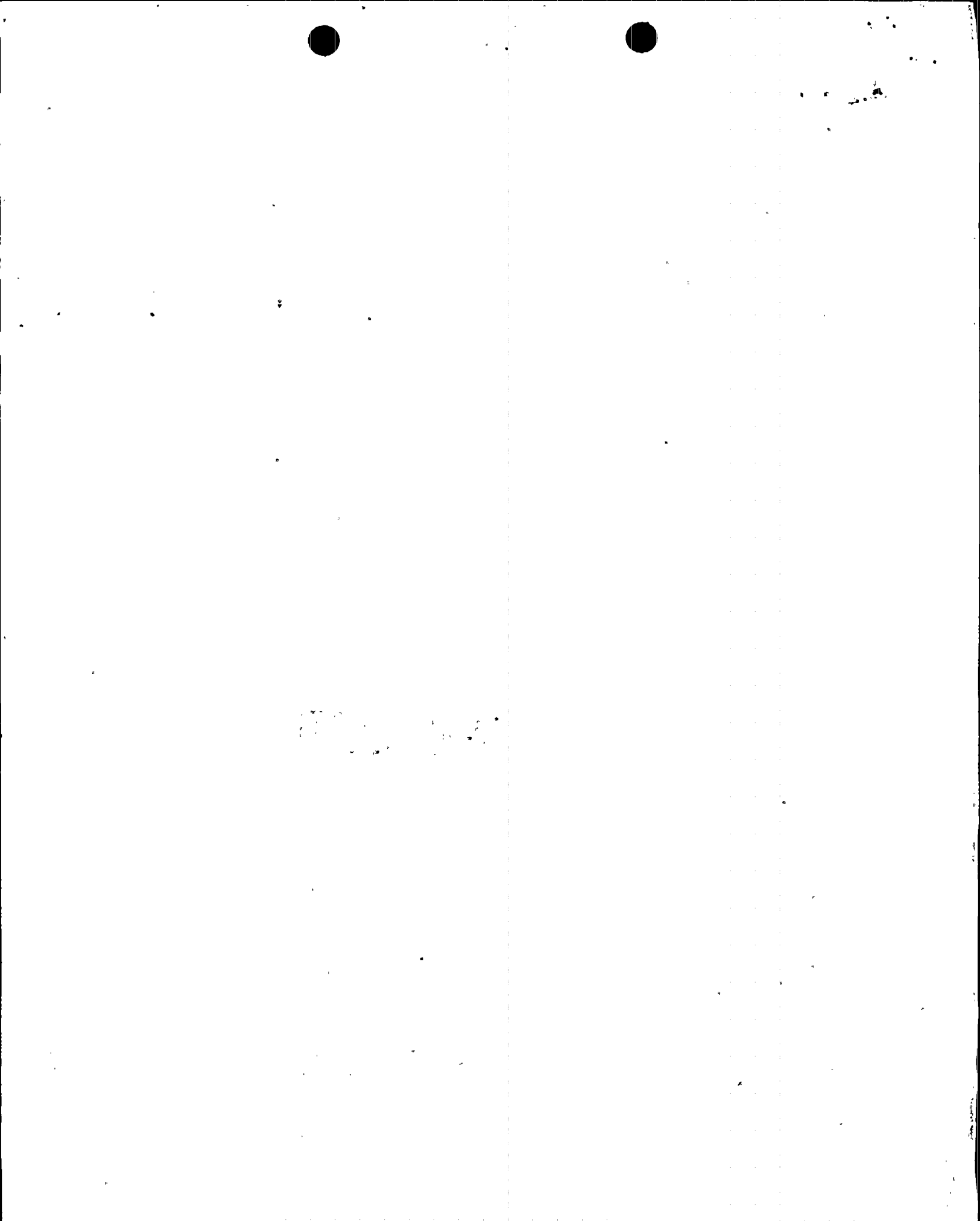
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102-04298-JML/AKK/MLG
June 26, 1999

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

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50 – 528/529/530
Response to Generic Letter (GL) 98-01 Supplement 1, 'YEAR 2000
READINESS OF COMPUTER SYSTEMS AT NUCLEAR POWER
PLANTS'**

Reference:

1. APS letter to the NRC 102-04156-JML/SAB/RMW dated August 5, 1998,
Response to NRC Generic Letter 98-01: "Year 2000 Readiness of
Computer Systems at Nuclear Power Plants".

This letter provides Arizona Public Service Company's (APS), response to NRC Generic Letter 98-01, Supplement 1, 'Year 2000 Readiness Of Computer Systems At Nuclear Power Plants'.

On January 14, 1999, the Commission issued Supplement 1 to Generic Letter 98-01 to modify the request for information in the original generic letter (APS' response to GL 98-01 is contained in reference 1).

The Supplement stated:

"In responding to this supplement to GL 98-01, the addressee should confirm Y2K readiness of the facility with regard to those systems within the scope of the license and NRC regulations, and those systems required for continued operation of the facility after January 1, 2000. For those systems which are not Y2K ready as of July 1, 1999, the addressee should provide a status and completion schedule for achieving readiness by the year 2000.

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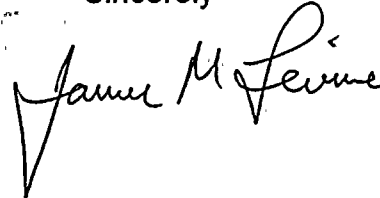
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Response to Generic Letter 98-01
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Arizona Public Service Company is voluntarily reporting facility readiness as outlined in Supplement 1 to Generic Letter 98-01. Enclosed in this letter is the Year 2000 Readiness Disclosure for the Palo Verde Nuclear Generating Station, reporting the status of facility Y2K readiness. This disclosure is submitted under the guidelines of the "Year 2000 Information and Readiness Disclosure Act" (Public Law 105-271) as year 2000 readiness disclosure.

No commitments are being made to the NRC by this letter.

Should you have any questions or concerns, please contact Scott A. Bauer at (623) 393-5978.

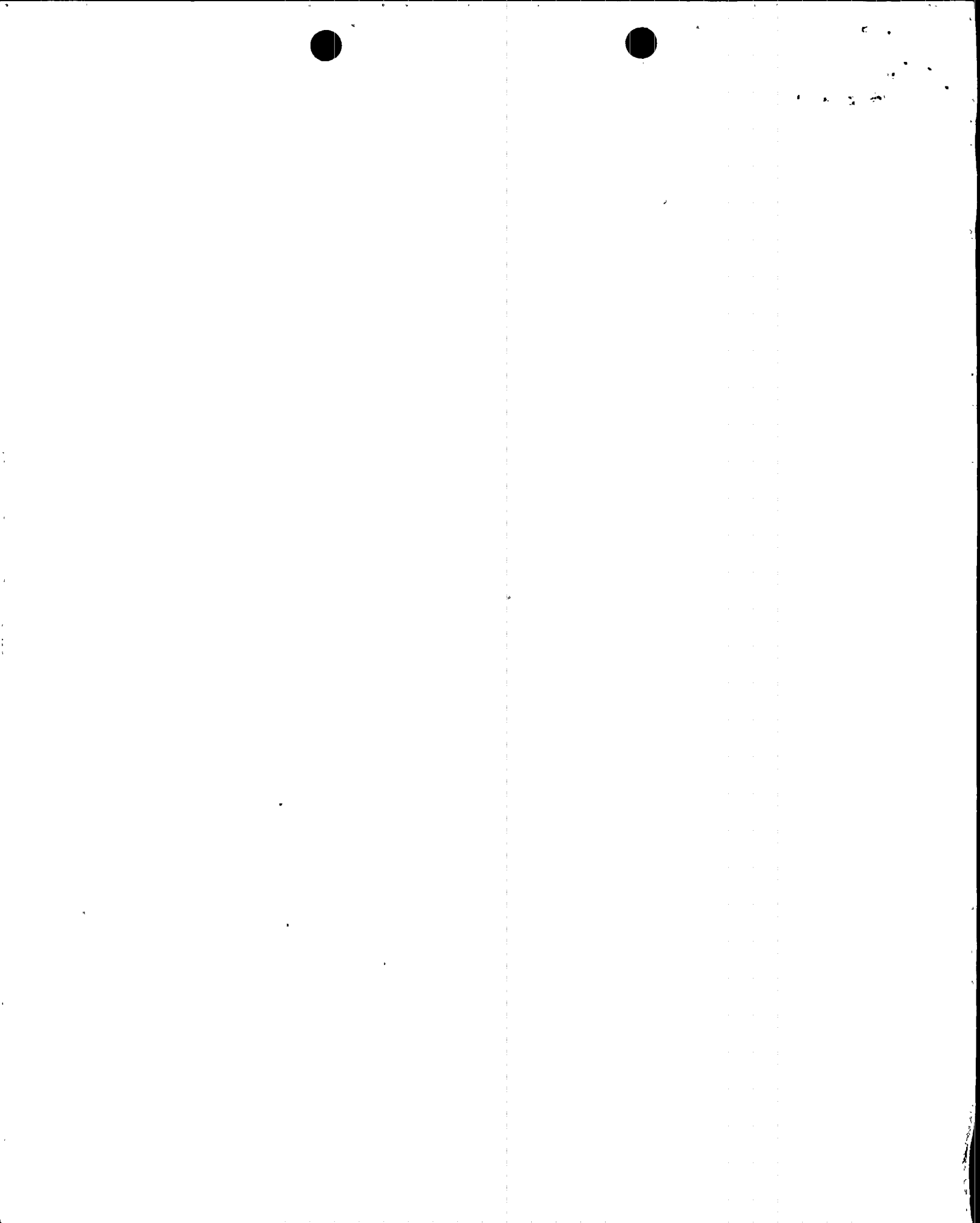
Sincerely

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/AKK/MLG/rh

Enclosure

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



Enclosure

GENERIC LETTER 98-01 REQUIRED INFORMATION

Year 2000 Readiness Disclosure



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GENERIC LETTER 98-01 REQUIRED INFORMATION

Year 2000 Readiness Disclosure

This year 2000 (Y2K) readiness disclosure is made for the Palo Verde Nuclear Generating Station (PVNGS) under the "Year 2000 Information and Readiness Disclosure Act" (Public Law 105-271) as year 2000 readiness disclosure.

This disclosure addresses the Y2K readiness of the facility with regard to those systems within the scope of the license, NRC regulations, and other systems required for continued operation of the facility after January 1, 2000. A facility that is "Y2K Ready" has followed a prescribed program to identify and resolve Y2K issues so the facility can operate reliably while meeting commitments.

Arizona Public Service Company has conducted a year 2000 readiness program similar to that outlined in Nuclear Utility Year 2000 Readiness, NEI/NUSMG 97-07. The program applies to software, hardware and firmware whose failure due to a Y2K problem would prevent the performance of the safety function of a structure, system or component. Additionally, the program applies to any software, hardware, or firmware whose failure due to a Y2K problem would prevent continued operation of the nuclear facility well beyond December 31, 1999. The facility program also includes identifying and, where appropriate, remediating embedded systems. The program provided for risk management efforts and development of contingency plans for key rollover dates.

The Y2K readiness program has been completed for those systems required for operation of PVNGS, including its associated Water Reclamation Facility and switchyard. The PVNGS safety systems required for safe shutdown were determined to be analog, or it was determined that they did not rely on computer dates (such as the core protection calculators), and are Y2K Ready. Quality augmented systems and other systems needed to operate the facility were properly assessed and remediated, or did not rely on computer dates and are also Y2K Ready. Some of the major embedded, and plant systems, that have completed the required Y2K remediation, include our plant monitoring system, emergency response and data acquisition system, radiation monitoring system, plant multiplexer, gas turbine generators, plant security system, Water Reclamation Facility distributed control systems, and switchyard equipment. Equipment and software located outside of the operating plants, but still important to long term plant operation, are also Y2K ready. Examples include the plant training simulator, emergency plan autodialer and higher priority engineering codes.



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The PVNGS Y2K Program has received independent reviews by our Nuclear Assurance Department, has been assessed by independent reviewers from Region IV utilities in November 1998, and by the PVNGS NRC resident inspectors in April 1999. PVNGS was also one of six nuclear utilities chosen by the NRC to be audited for Y2K contingency planning in May of 1999. All of these Y2K assessments conducted to date indicate a sound Y2K program, which will be successful in achieving Y2K Readiness. In addition, the PVNGS Y2K program is scheduled to be audited by the PVNGS Nuclear Assurance Department in August of 1999. To the best of my knowledge and belief the Palo Verde Nuclear Generating Station is "Y2K Ready." Further, contingency plans have been developed to mitigate the impact of both Internal and External Y2K-induced events at key rollover dates.

