

Arizona Public Service Company

P.O. BOX 53999 • PHOENIX, ARIZONA 85072-3999

WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-02457-WFC/TRB/JJN
March 23, 1993

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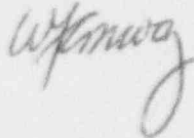
Reference: Letter dated February 26, 1993, from S. A. Richards, Acting Branch Chief,
Reactor Projects Branch, NRC, to W. F. Conway, Executive Vice President,
Nuclear, APS

Subject: **Paio Verde Nuclear Generating Station (PVNGS)**
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Notice of Deviation 50-528/92-43-02
File: 93-070-026

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/92-43, and the Notice of Deviation, dated February 26, 1993. Pursuant to the provisions of 10 CFR 2 Appendix C, APS' response is provided as Enclosure 1. Appendix A to this letter is a restatement of the Notice of Deviation.

If you should have any questions, please call Thomas R. Bradish at (602) 393-5421.

Sincerely,



WFC/TRB/JJN/ap
Enclosures:

1. Appendix A - Restatement of Notice of Deviation
2. Enclosure 1 - Reply to the Notice of Deviation

cc: J. B. Martin
J. A. Sloan

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APPENDIX A

RESTATEMENT OF NOTICE OF DEVIATION
50-528/92-43-02

NRC INSPECTION CONDUCTED
DECEMBER 15, 1992 - JANUARY 19, 1993

INSPECTION REPORT NOS. 50-528/529/530/92-43

RESTATEMENT OF NOTICE OF DEVIATION 50-528/92-43-02

During an NRC inspection conducted on December 15, 1992 through January 19, 1993, one deviation of your Updated Final Safety Analysis Report (UFSAR) was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the deviation is listed below:

Section 13.1.1.3 of the UFSAR states: "The education and experience qualification requirements for management and technical support organization engineering staff are established in PVNGS (Palo Verde Nuclear Generating Station) position descriptions. PVNGS position descriptions are developed using the guidance of ANSI 3.1-1978."

PVNGS position descriptions for job codes 43004, 43004, 40516, 40517, 40754, 40767, and 40777 all require a Bachelor of Science degree in engineering.

Contrary to the above, 14 people in the above job codes did not have a Bachelor of Science degree in engineering.

ENCLOSURE 1

REPLY TO NOTICE OF DEVIATION
50-528/92-43-02

NRC INSPECTION CONDUCTED
DECEMBER 15, 1992 THROUGH JANUARY 19, 1993

INSPECTION REPORT NOS. 50-528/529/530/92-43

REPLY TO NOTICE OF DEVIATION

50-528/92-43-02

Reason For The Deviation

The reason for the deviation was an incomplete description of the intended change to the FSAR. APS intended to raise the qualification standards for new personnel in engineering positions. The change to the FSAR was expected to be applicable only to personnel hired subsequent to the change.

Corrective Steps Which Have Been Taken And Results Achieved

APS has evaluated the individuals who are employed in positions currently which require a Bachelor's of Science degree in engineering but have not attained this degree. These individuals have been determined to be appropriately qualified in accordance with ANSI 3.1-1978 and other relevant requirements.

Corrective Steps Which Will Be Taken to Avoid Further Deviations

APS will revise UFSAR 13.1.1.3 to clarify the qualification requirements for the engineering staff. This revision is expected to be completed by April 30, 1993.

Date When Correction Action Will Be Completed

The revision to the UFSAR 13.1.1.3 is expected to be completed by April 30, 1993.