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April 24, 1984
ANPP-29356-BSK/TRB

U. S. Nuclear Regulatory Commission
Region V
Creskide Oaks Office Park
1450 Maria Lane - Suite 210
Walnut Creek, CA 94596-5368

Attention: Mr. T. W. Bishop, Director
Division of Resident
Reactor Projects and Engineering Programs

Subject: Quality of 10CFR50.55(e) Reports
File: 84-019-026; D.4.33.2

Reference: NRC letter to Mr. E. E. Van Brunt, Jr., dated April 6, 1984

Dear Sir:

In response to the referenced letter, APS is always receptive to suggestions on ways to improve the quality of our 10CFR50.55(e) reports. Since the inception of the Palo Verde Project, we have vigorously pursued a policy of informing and maintaining the NRC fully aware of any deficient conditions arising from the construction and Start-up of the PVNGS. The NRC previously indicated satisfaction with APS' implementation of the 10CFR50.55(e) regulations. However, we continually strive to increase the quality of these reports.

Since many 50.55(e) reportable condition Deficiency Evaluation Reports (DERs) are highly technical in nature, they require extensive engineering analysis and calculations to reach a satisfactory disposition. In many cases, it is very difficult to present technical information in a manner that is readily understandable without access to specifications or drawings.

To further improve our reports to the NRC, APS will attempt to convey information in a more understandable manner including, where appropriate, visual aids to help clarify information.

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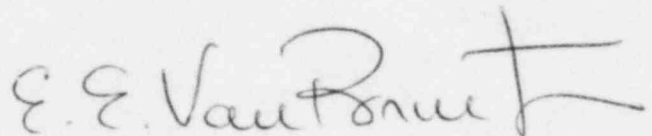
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As noted in your letter, APS has endeavored to be as responsive to the NRC's questions and concerns as possible. If questions as to the clarity of the reports arise in the future, we recommend that the NRC contact us by phone. Clarification will be provided either verbally or by formal written correspondence, as requested.

Attachment A addresses the specific questions related to the Final Report on DER 83-63. If there are any further questions, please let me know.

Very truly yours,

A handwritten signature in dark ink, appearing to read "E. E. Van Brunt, Jr.", with a stylized flourish at the end.

E. E. Van Brunt, Jr.
APS Vice President, Nuclear
ANPP Project Director

EEVB/TRB:ru

Attachment

cc: See Page Three

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Page Three

cc: Richard DeYoung, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

T. G. Woods, Jr.
D. B. Karner
W. E. Ide
D. B. Fasnacht
A. C. Rogers
B. S. Kaplan
L. A. Souza
D. E. Fowler
J. Vorees
J. R. Bynum
J. M. Allen
P. P. Klute
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D. R. Hawkinson
L. E. Vorderbrueggen
G. A. Fiorelli
S. R. Frost
J. Self
D. Canady

Records Center
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
Atlanta, GA 30339

ATTACHMENT A

RESPONSE TO DEFICIENCY EVALUATION REPORT 83-63

Regarding the specific Deficiency Evaluation Report (83-63), enclosed in the referenced letter, the NRC is correct in pointing out the date was mis-typed. In statement number three of the Corrective Action, the word 'or' should have been 'on'. To further clarify this statement, the normal setting of the opening torque switch bypass limit switch is 10% of stem travel. CE, with concurrence from the valve supplier, has recommended setting the bypass limit switch to 65%. This action will ensure that the valve will open to a position sufficient to meet specified flow rates for the system. APS disagrees however, with your comment concerning Limitorque operator model numbers. APS, through CE, purchases the valve from Borg-Warner as a unit (operator included) under a Borg-Warner model number. The valve number and model number was included in the Condition Description section of the Final Report. This sufficiently identifies the deficient component to the NRC. As noted in the Corrective Action section of the report, a copy of the report was sent to CE for their review under the requirements of 10 CFR Part 21. APS believes identification of components used in the manufacture of the final product is the responsibility of the vendor which furnishes APS with the end product.

Additionally, we should like to point out that this report was re-opened and the NRC was promptly notified when the Corrective Action specified in our report failed to remedy the deficient condition.