

Arizona Public Service Company

May 1, 1984
NOLD 84-209

Mr. John B. Martin
Office of Inspection and Enforcement
Region V
U. S. Nuclear Regulatory Commission
1450 Maria Lane, Suite 210
Walnut Creek Plaza
Walnut Creek, CA 94596

Subject: Palo Verde Nuclear Generating Station
Units 1, 2, and 3
System Qualification Program
Docket Nos. STN 50-528/529/530
File: 84-019-026

Reference: Letter from J. B. Martin to E. E. Van Brunt, Jr. (NRC IE
Inspection Report 50-528/84-07) dated April 16, 1984.

Dear Mr. Martin:

In your referenced letter, you requested that we provide you with the following information regarding our system qualification program:

1. Our commitment to completion and documentation of system qualification.
2. Identification of plant systems important to plant operation or safety for which systems qualification will be completed.
3. A proposed definition of what will be included with the scope of system qualification.

During our conference call with your staff and Mr. Don Beckham of NRR on 4/20/84, we proposed the following for completion of system qualifications:

COMPLETION DATES

- A. LICENSED OPERATORS:
FINISH SYSTEM QUALIFICATION BOOK TWO MONTHS BEFORE UNIT I
FUEL LOAD (FUEL LOAD SCHEDULED NOV. 1984)
- B. OPERATORS TO LICENSE JULY 1984:
FINISH SYSTEM QUALIFICATION BOOK BY UNIT I FUEL LOAD
(SCHEDULED NOV. 1984)
- C. OPERATORS TO LICENSE MARCH 1985:
FINISH SYSTEM QUALIFICATION BOOK BY UNIT II FUEL LOAD

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- D. OPERATORS TO LICENSE AFTER MARCH 1985:
FINISH SYSTEM QUALIFICATION BOOK BY LICENSE EXAM
- E. OPERATORS WILL NOT BE PUT IN A LICENSE POSITION UNTIL:
 - 1. NRC LICENSE OBTAINED, AND
 - 2. COMPLETION OF QUALIFICATIONS.

During our conversation, your staff and Mr. Beckham agreed with items A, B, D, and E above, but stated they did not agree with item C and further stated that the operators scheduled to license in March 1985 would have to complete their system qualifications prior to taking their NRC examination. We agreed to review our schedule and system qualifications to determine if this was possible and contact you on the feasibility of this date. We now commit to the following, based on the attached operator qualification program.

COMPLETION DATES

- A. LICENSED OPERATORS:
FINISH SYSTEM QUALIFICATION BOOK TWO MONTHS BEFORE UNIT I FUEL LOAD (SCHEDULED NOV. 1984)
- B. OPERATORS TO LICENSE BY JULY 1984:
FINISH SYSTEM QUALIFICATION BOOK BY UNIT I FUEL LOAD (SCHEDULED NOV. 1984)
- C. OPERATORS TO LICENSE MARCH 1985:
FINISH SYSTEM QUALIFICATION BOOK BY LICENSE EXAM
- D. OPERATORS TO LICENSE AFTER MARCH 1985:
FINISH SYSTEM QUALIFICATION BOOK BY LICENSE EXAM
- E. OPERATORS WILL NOT BE PUT IN A LICENSE POSITION UNTIL:
 - 1. NRC LICENSE OBTAINED, AND
 - 2. COMPLETION OF QUALIFICATIONS.

Attached, is our system qualification document entitled "Licensed Operator Qualification Standard, 40AC-OZZ13". In this document, you will find the identification of plant systems important to plant operation or safety for which system qualifications program will be completed as well as system qualification program for licensed operators.

The selection criteria used for these systems were those systems which are safety related, required for safe shutdown and major plant systems controlled from the control room.

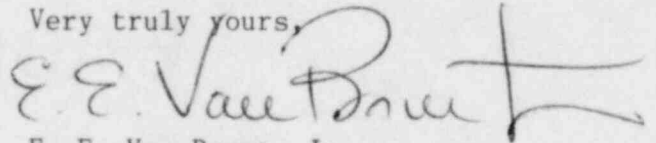
Also discussed during our conference call on April 20, 1984 was the subject of our operators obtaining a multi-unit license for all three PVNGS units. All parties participating in this discussion agreed that it would be advantageous for all concerns to have PVNGS operators obtain multi-unit licenses.

We would like to initiate detailed discussions for implementing a multi-unit license program between you, and your staff, NRR and APS.

Mr. Steven R. Frost will contact Mr. Robert Pate of your staff to set up a meeting in May 1984.

This response addresses your concerns of the subject Inspection Report. If you have any questions on the System Qualification Program, we would be happy to discuss them at your earliest convenience.

Very truly yours,



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

EEVBJr/JMA/mb
Attachment

cc: Director, Office of Nuclear Reactor Regulation
Director, Office of Inspection and Enforcement
NRC Resident Inspector - PVNGS
NRC Project Manager - PVNGS