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May 2, 1984
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Mr. John B. Martin
Office of Inspection and Enforcement
Region V
U. S. Nuclear Regulatory Commission
1450 Marie Lane, Suite 210
Walnut Creek, Ca. 94596

Subject: NRC Inspection - Palo Verde Units 1 and 2
Docket Nos. STN 50-528/529
File: 84-019-026

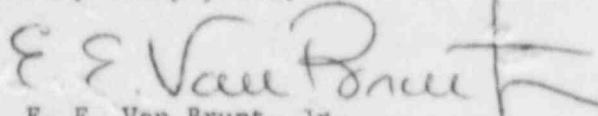
Reference: Letter from Mr. T. W. Bishop to Mr. E. E. Van Brunt dated
March 12, 1984 Inspection Report Nos. 50-528/84-07.

Dear Mr. Martin:

The purpose of this letter is to respond to the concerns raised by Mr. G. Fiorelli as a result of his inspection activities during February, 1984. The referenced letter identified a concern with the review of non-owner design changes to assure their correct incorporation into such things as operating procedures, preventative maintenance and training. The attached pages describe our actions to address this issue.

We believe this response addresses the concerns raised during the inspection. If there are any further questions, please contact Todd Bloom at (602) 943-720 ext. 6159.

Very truly yours,



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

EEVB:TB:sb

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

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DESIGN CHANGE DOCUMENT
REVIEW RECOVERY PROGRAM

A Design Change Document Review Recovery Program has been established to ensure all applicable design change documentation is reviewed for impact on procedures, programs and activities of the station. The program has been implemented to address previously issued design change documents and is complemented, at present, by an ongoing review of newly issued documents. The program is outlined below and controlled in accordance with procedure 73AC-0ZZ26, Transmittal and Review of Design Change Packages (DCP's)/Plant Change Packages (PCP's)/Field Change Requests (FCR's) by Nuclear Operations. This procedure is being used for the recovery program and the ongoing review program to ensure review of all new changes.

PURPOSE:

The purpose of the program is to ensure that all design change documentation is reviewed for impact on procedures, programs and activities within Nuclear Operations.

SCOPE:

The scope of the recovery program includes previously issued documents from a prescribed date back. All new changes from this date forward will be handled in accordance with the existing design change review program. The documents included in the review include Design Change Packages (DCP's), Startup Field Reports/Field Change Requests (SFR/FCR Minor Changes), and As-Built (Unit Specific - NA) Field Change Requests, Startup Nonconformance Reports (NA-FCR's, NA-SNCR's). The scope of this review will include "Q" and "R" quality class documents. This program is complemented after the prescribed date with the previously established Operations program for review of design changes to ensure consistency. The reviews will be applicable to Operations, PM Maintenance, Training, Security, Simulator, FSAR/TECH SPEC., Surveillance, Emergency Planning, ALARA, and Radiation Protection.

PROGRAM:

The program requires all DCP's, SFR/FCR's, NA-FCR's, and NA-SNCR's listed on the project as-built log (Design Document Register) to be reviewed for applicability to procedures, programs and activities. The documentation is being assembled by drawing number as applicable by the As-Built Records Management Department into a formal review package. The review package is screened for potential impact on the procedure, programs and activities. The screening process is performed by engineers and is based on functional applicability. The intent of this function is to screen out those changes which have no potential to impact the aforementioned items. The changes determined to have potential impact are transmitted to and reviewed by the applicable organizations in accordance with 73AC-0ZZ26, Transmittal and Review of DCP's/PCP's/FCR's by Nuclear Operations. The review includes the design document number, the impact (if applicable), the update action and update completion. The reviews are signed, documented and filed. The review documentation is filed with the applicable design change document. These files will be available for future reference.