



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

OCT 23 1996

James M. Levine, Senior Vice
President, Nuclear
Arizona Public Service Company
P.O. Box 53999
Phoenix, Arizona 85072-3999

SUBJECT: TRAINING AND QUALIFICATION PLAN FOR TRANSFER TO HEADQUARTERS

Dear Mr. Levine:

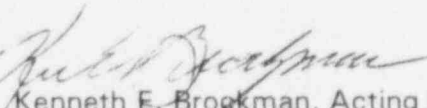
This letter acknowledges receipt of your letter dated April 12, 1996, which transmitted Revision 12 to the Training and Qualification Plan for the Palo Verde Nuclear Generating Station, submitted under the provisions of 10 CFR 50.54(p).

Based on your determination that the changes do not decrease the overall effectiveness of your training and qualification plan and after limited review of the changes, no NRC approval is required for some of the changes, in accordance with 50.54(p). Implementation of these changes will be subject to inspection to confirm that the changes have not decreased the overall effectiveness of your security plan.

However, a change appears to be inconsistent with the criteria of 10 CFR 50.54(p) and is being referred to our Office of Nuclear Reactor Regulation. The change is identified in enclosure 1 to this letter. Additionally, other changes, while meeting the criteria of 10 CFR 50.54(p), require clarification as identified in enclosure 2 to this letter.

The enclosures to your letter contain Safeguards Information as specified in 10 CFR 73.21 and are being withheld from public disclosure. In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter will be placed in the NRC Public Document Room.

Sincerely,


Kenneth E. Brookman, Acting Director
Division of Reactor Safety

Enclosures: As stated

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PDR ADOCK 05000528
P PDR

Arizona Public Service Company

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Docket Nos.: 50-528
50-529
50-530
License Nos.: NPF-41
NPF-51
NPF-74

cc w/enclosures:

Mr. Steve Olea

Arizona Corporation Commission
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Law Department, Generation Resources
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Arizona Radiation Regulatory Agency
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bcc to DMB (IE53)

bcc w/enclosures distrib. by RIV:

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NRR Docket File

Resident Inspector
RIV Docket File
DRP Director
DRS/PSB Security File (Goines)
MIS System
RITS Coordinator (Elko)

DRS AI File 96S0022

DOCUMENT NAME: A:\AI60022S.DWS

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10/ 21 /96		10/ 22 /96		10/ 22 /96				

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Arizona Public Service Company

-3-

bcc to DMB (IE53)

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ENCLOSURE 1

Dockets 50-528, 529 and 530

CHANGE TO REVISION 12 OF THE PALO VERDE TRAINING AND QUALIFICATION PLAN THAT DID NOT MEET THE CRITERIA OF 10 CFR 50.54(p) AND DECREASED THE EFFECTIVENESS OF THE PALO VERDE TRAINING AND QUALIFICATION PLAN

Specific words and phrases have been highlighted for emphasis only.

TRAINING AND QUALIFICATION PLAN

ITEM NO.	PAGE	SECTION	REMARKS
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1.	8	2.4.1	<p>Revision 12 proposed that "A physical exercise program is administered in accordance with 10 CFR 73, Appendix B, Section I.C." The licensee's attached "Justification of Changes," stated that the description of the physical agility tasks (describing how the physical exercise program fitness evaluation will be conducted) are identified in the security training procedures.</p> <p>Paragraph 4.1.1 of the approved (Revision 11) Training and Qualification Plan stated that, "A physical agility test (Attachment 1) is administered prior to an individual's assignment to shift duty as an armed member of the PVNGS Security Force." Attachment 1 of the Training and Qualification Plan identified the individual physical agility tasks.</p> <p>10 CFR 73, Appendix B, Section I.C, requires, in part, that armed response personnel shall demonstrate physical fitness for assigned security job duties by performing a practical physical exercise program, and that the exercise program performance objectives (i.e., physical tasks, conditions and standards of the physical exercise program) "shall be described in the licensee training and qualification plan."</p> <p>NUREG 0674, Security Personnel Training and Qualification Criteria, dated May 1980, outlines the criteria for reviewing Training and Qualification Plans. Section 2.4 of NUREG 0674 specifies that licensees must identify a physical exercise program to be performed by all guards and armed response personnel within a specific time period.</p> <p>GL 95-08, titled: "10 CFR 50.54(p) Process For Changes To Security Plans Without Prior NRC Approval," states that a</p>
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change made pursuant to 10 CFR 50.54(p) cannot delete or replace any of the regulatory capabilities as described in paragraphs (b) through (h) or in Appendixes B and C of 10 CFR Part 73.

The deletion from Revision 12 of the exercise program performance objectives, previously described in Attachment 1 of the Training and Qualification Plan, contradicted a regulatory requirement and decreased the effectiveness of the approved Training and Qualification Plan.

ENCLOSURE 2

Dockets 50-528, 529 and 530

CHANGES TO REVISION 12 OF THE PALO VERDE TRAINING AND QUALIFICATION PLAN REQUIRING CLARIFICATION

Specific words and phrases have been highlighted or underlined for emphasis only.

TRAINING AND QUALIFICATION PLAN

ITEM NO.	PAGE	SECTION	REMARKS
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1.	3	1.2.2	Revision 12 proposed that the Training and Qualification Plan is "applicable to members of the PVNGS Security Force as defined in the Security Plan," and that this Plan does not apply to other PVNGS security personnel who have general responsibilities for supervising or assisting the operational security force.
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As stated, it is unclear if requirements of this Plan are applicable to the non-uniformed Security Shift Supervisors (senior representative for each security shift).

10 CFR 73, Appendix B, (Introduction) states, in part, that "**Security personnel** who are responsible for the protection of special nuclear material on site... should, like other elements of the physical security system, be required to meet minimum criteria to ensure that they will effectively perform their assigned security-related job duties."

On October 16, 1996, the licensee telephonically stated that the next revision of the Training and Qualification Plan would clarify this issue.

2.	7	2.2.9.1 2.4.2.1 3.3.1.1	Revision 12 proposed that there are "exceptions," as defined in the Physical Security Plan, that "permit the extension of all or parts of an individuals or groups training as defined in the Physical Security Plan."
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To insure understanding of this "exception," the Training and Qualification Plan needs to clearly specify that utilization of the 25% extension requires that over a 39 month period, the annual retraining be completed a minimum of 3 times.

On October 16, 1996, the licensee telephonically stated that in order to prevent confusion, the definition of "exception," referenced in the Physical Security Plan, would also be included in the next revision of the training and qualification plan.

3. 9

2.5

Revision 12 proposed removal of specific training requirements for contract security personnel on the basis that a contract force is not currently being used to supplement the licensee's security force. Revision 12 also proposed that **"The training and qualification of contract security personnel is documented and attested to by the Security Training Section Leader/designee."**

The licensee's attached "Justification of Changes" stated that if contract personnel would be again used, their training "would be in accordance with their assigned security job duties as indicated in Attachment 1."

Paragraph 5.0 of the approved (Revision 11) Training and Qualification Plan also states, in part, that "Contract Security personnel meet the suitability, physical and mental requirements appropriate with their assigned duties in accordance with this Plan and 10 CFR 73 Appendix B Section I. Contract Security personnel who are assigned to the PVNGS Security Force as full time, are trained and qualified to the same standards and requirements as for PVNGS Security Force members."

The elimination of the underlined portion from the proposed (Revision 12) change has the potential to decrease the effectiveness of the approved Training and Qualification Plan.

On October 16, 1996, the licensee telephonically agreed that the above underlined requirements would be returned to the Training and Qualification Plan.