

SEP 17 1982

✓ Docket Nos. 50-528/50-529
and 50-530

Mr. E. E. Van Brunt, Jr.
Vice President --Nuclear Projects
Arizona Public Service Company
Post Office Box 21666
Phoenix, Arizona 85036

Dear Mr. Van Brunt:

Subject: Accuracy of Calibration Standards - Palo Verde Nuclear
Generating Station

As a result of the staff's further review of Section 17.2.12 of the Palo Verde FSAR, we have determined that the commitment regarding the accuracy of calibration standards, as stated on page 17.2-56 of Amendment No. 9, is not acceptable.

To be acceptable, justification should be provided on the 2nd and 3rd paragraphs on page 17.2-56 should be revised as follows:

"Calibrations of permanent plant equipment, M&TE and Calibration Standards shall be performed with the item used to calibrate having inaccuracy better than the item being calibrated."

"In addition, there shall be four to one ratio of inaccuracies between either:

- (1) An item of M&TE used to calibrate permanent plant equipment and the calibration standard used to calibrate that item of M&TE (e.g., if M&TE inaccuracy is $\pm 1\%$, the calibration standard inaccuracy must be $\pm 0.25\%$ or less).

OR

- (2) An item of permanent plant equipment and the M&TE used to calibrate that item of permanent plant equipment (e.g., if permanent plant equipment inaccuracy is $\pm 1\%$, M&TE inaccuracy must be $\pm 0.25\%$ or less)."

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Mr. E. E. Van Brunt

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Therefore, we request that you amend the Palo Verde FSAR accordingly. Within two weeks of receipt of this letter, provide us the date by which you plan to respond to this request.

If you have any questions, regarding this request, contact E. A. Licitra, the Project Manager at 301/492-7200.

Sincerely,

Frank J. Miraglia, Chief
Licensing Branch No. 3
Division of Licensing

cc: See next page

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