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 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530

AUTH.NAME AUTHOR AFFILIATION
 VAN BRUNT,E.E. Arizona Public Service Co.
 RECIP.NAME RECIPIENT AFFILIATION
 NOVAK,T.M. Assistant Director for Licensing

SUBJECT: Forwards proposed FSAR revision reflecting NRC
 recommendations contained in 820917 ltr re accuracy of
 calibr stds.

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 TITLE: Licensing Submittal: PSAR/FSAR Amdts & Related Correspondence

NOTES:Standardized plant. 05000528
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PUBLIC SERVICE COMPANY

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October 27, 1982
ANPP-22118 - WFQ/KEJ

^M
Mr. T. H. Novak
Assistant Director for Licensing
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Palo Verde Nuclear Generating Station
(PVNGS) Units 1, 2 and 3
Docket Nos. STN-50 528/529/530
File: 82-056-026; G.1.01.10

- References:
1. Letter from F. J. Miraglia, NRC, to E. E. Van Brunt, Jr., APS, dated September 17, 1982
 2. NUREG-0857, Supplement No. 3, dated September, 1982, "Safety Evaluation Report related to the operation of the Palo Verde Nuclear Generating Station Units 1, 2 and 3.

Dear Mr. Novak:

The Referenced (1) letter submitted staff's comments regarding the accuracy of calibration standards discussed in amendment 9 of the PVNGS FSAR (Section 17.2.12) and stated that the commitments made in that section were not acceptable. To be acceptable, the staff recommended a revision to the FSAR or asked for justification of the calibration accuracies mentioned. Attached is a proposed FSAR revision reflecting the staffs' recommendations described in the Referenced (1) letter.

This also resolves the open item discussed in section 17.5 of the Reference (2) supplement to the SER.

If you have any questions concerning this matter, please contact me.

Very truly yours,

E. E. Van Brunt

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

EEVBJr/KEJ/sp
Attachment

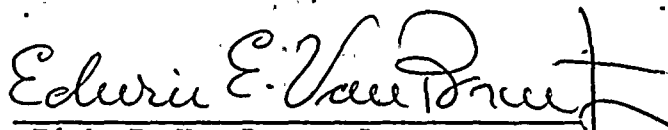
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A PDR

October 27, 1982
ANPP-22118 - WFQ/KEJ

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President Nuclear Projects of Arizona Public Service Company, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority so to do, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true.


Edwin E. Van Brunt, Jr.

Sworn to before me this 27th day of October, 1982.


Notary Public

My Commission expires:
My Commission Expires May 19, 1986

My Commission Expires May 10, 1989

Question 17A.63 (NRC letter (Miraglia) 9/17/82) (17.2.12)

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)."

Therefore, we request that you amend the Palo Verde FSAR accordingly.

RESPONSE: The response is included in amended section 17.2.12.

and other inspection, measuring, and testing equipment and devices are of the proper range, type, and accuracy.

Calibration standards used for calibrating measuring and test equipment (M&TE) shall have calibration ranges and accuracies so that M&TE and installed plant equipment can be calibrated and maintained within required tolerances.

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

In addition, there shall be a ^{four} ~~three~~ 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 $\pm 1.5\%$, M&TE inaccuracy must be $.5\%$ or less).

Justification of the acceptability of calibrations that do not meet ^{any of} the above criteria shall be documented.

Calibration is performed against equipment certified to have known valid relationship to nationally recognized standards. Where national standards do not exist, provisions are established to document the basis for calibration. Special calibration and control measures are not required for devices when normal commercial practices provide adequate accuracy.

Administrative procedures shall include the requirement that whenever inspection, test, or measuring equipment is found to

