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ANPP-24169 - WFQ/JYM REGION V I&E

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U. S. Nuclear Regulatory Commission  
Region V  
Creskide Oaks Office Park  
1450 Maria Lane - Suite 210  
Walnut Creek, California 94596-5368

Attention: Mr. D. M. Sternberg, Chief  
Reactor Projects Branch 1

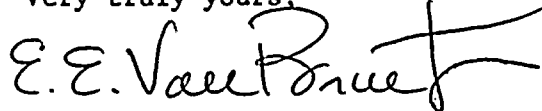
Subject: Palo Verde Nuclear Generating Station  
(PVNGS) Docket Nos. STN-50/528/529/530  
File: 83-056-026; G.1.01.10

Dear Mr. Sternberg:

Pursuant to the requirements of 10CFR50.54 (a) (Federal Register, dated January 10, 1983), please find attached a proposed revision to section 1.8 of the FSAR concerning exceptions to Regulatory Guide 1.88. Also attached is a description of the pages affected by the change, the reason for the change and the acceptibility of the change.

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

Very truly yours,



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



EEVB/JYM/sp  
Attachment

cc: E. A. Licitra (w/a)  
A. C. Gehr "  
J. Spraul (QAB) "  
G. Fiorelli "  
(PVNGS Resident Inspector)  
Document Control Desk (w/a)

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June 24, 1983  
ANPP-24169 - WFQ/JYM

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.*

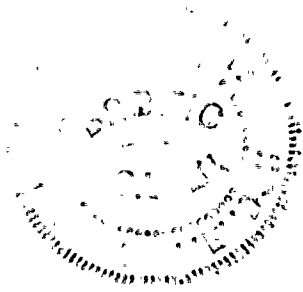
Edwin E. Van Brunt, Jr.

Sworn to before me this 24<sup>th</sup> day of June, 1983.

*Nora E. Meador*  
Notary Public

My Commission expires:

My Commission Expires April 6, 1987



PROPOSED CHANGE TO  
PVNGS FSAR  
SECTION 1.8

I. DESCRIPTION OF CHANGE

This proposed revision provides the following changes to the Applicant's position with respect to Regulatory Guide 1.88:

- A. clarifies the commitment to comply with ANSI N45.2.9 by eliminating reference to NFPA-232,
- B. allows level concrete floor and roof in the records storage facility, and
- C. establishes interim records storage provisions (for working files), including requirements for physical protection of records and limitation of maximum interval that records may be retained under interim storage provisions.

II. REASON FOR CHANGE

- A. Position 2 of Regulatory Guide 1.88 states that NFPA-232 provides an acceptable alternative to the fire protection provisions listed in Subdivision 5.6 of ANSI N45.2.9. Section 1.8 of the FSAR currently includes conformance with NFPA-232. To relieve some confusion that was caused by the current position, this proposed revision deletes the commitment to conform with NFPA-232 and more clearly describes conformance with ANSI N45.2.9.
- B. An exception is necessary to allow usage of a records storage facility with level concrete floor and roof, since the halon fire suppression system makes provisions for drainage unnecessary.
- C. Establishment of interim records storage provisions is necessary since the Regulatory Guide and the endorsed standard do not prescribe the maximum acceptable interval for transferring records to the permanent storage facility or the measures required to protect such records in the interim.

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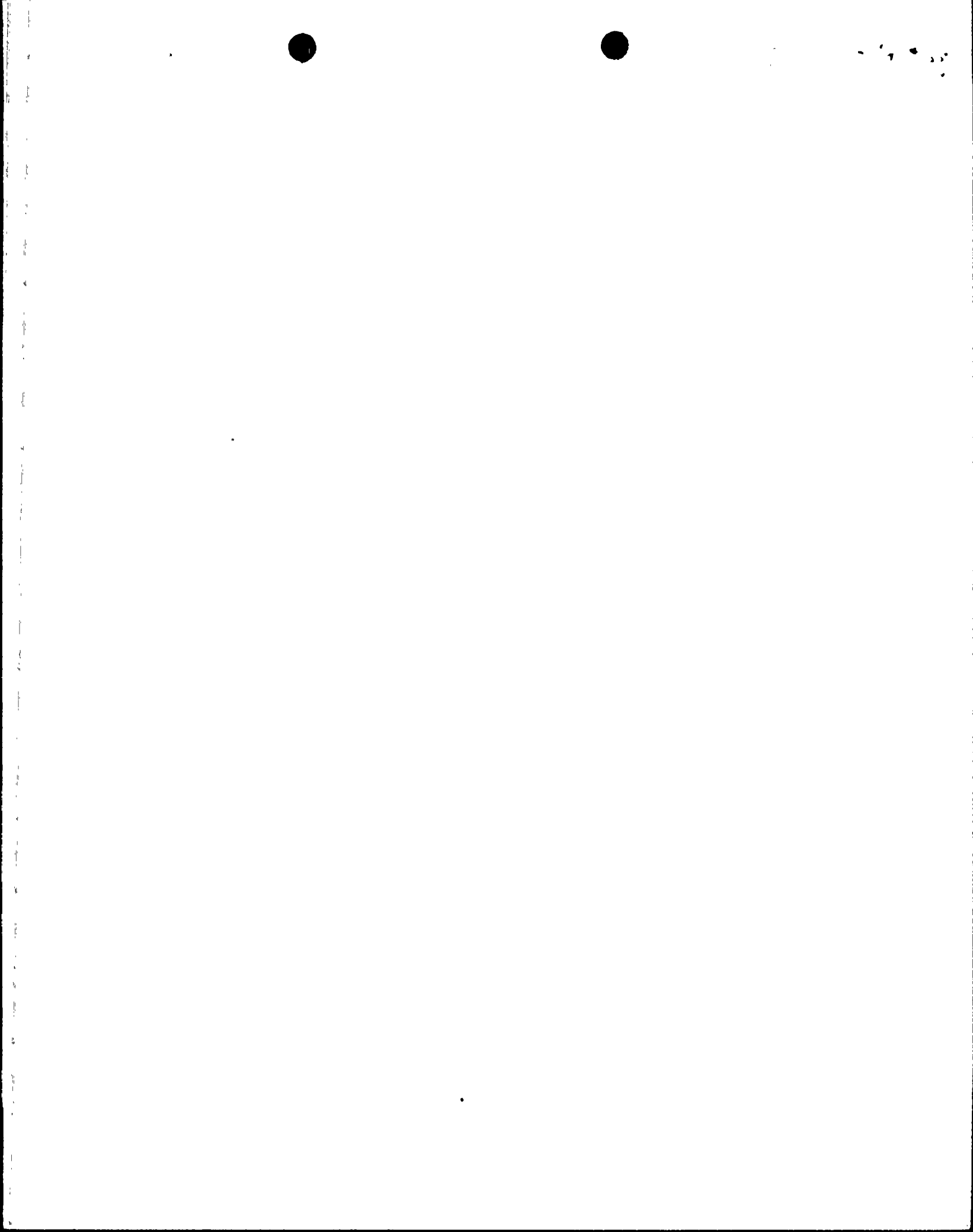
- The maximum period of twenty-four month for retention of records under interim storage provisions is intended to allow one year's records to be available in working files for reference and review purposes in addition to providing adequate time to transfer records to the permanent storage facility. The twenty-four month period is also established, in conjunction with the other measures specified for interim storage, to limit the risk of loss, damage or destruction of records to an acceptable level.

### III. BASIS FOR ACCEPTABILITY OF CHANGE

- A. Criterion XVII , "Quality Assurance Records", of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants", to 10CFR Part 50, "Licensing of Production and Utilization Facilities", requires, in part, that, consistent with applicable regulatory requirements, the applicant establish requirements concerning record retention, such as duration, location, and assigned responsibility.

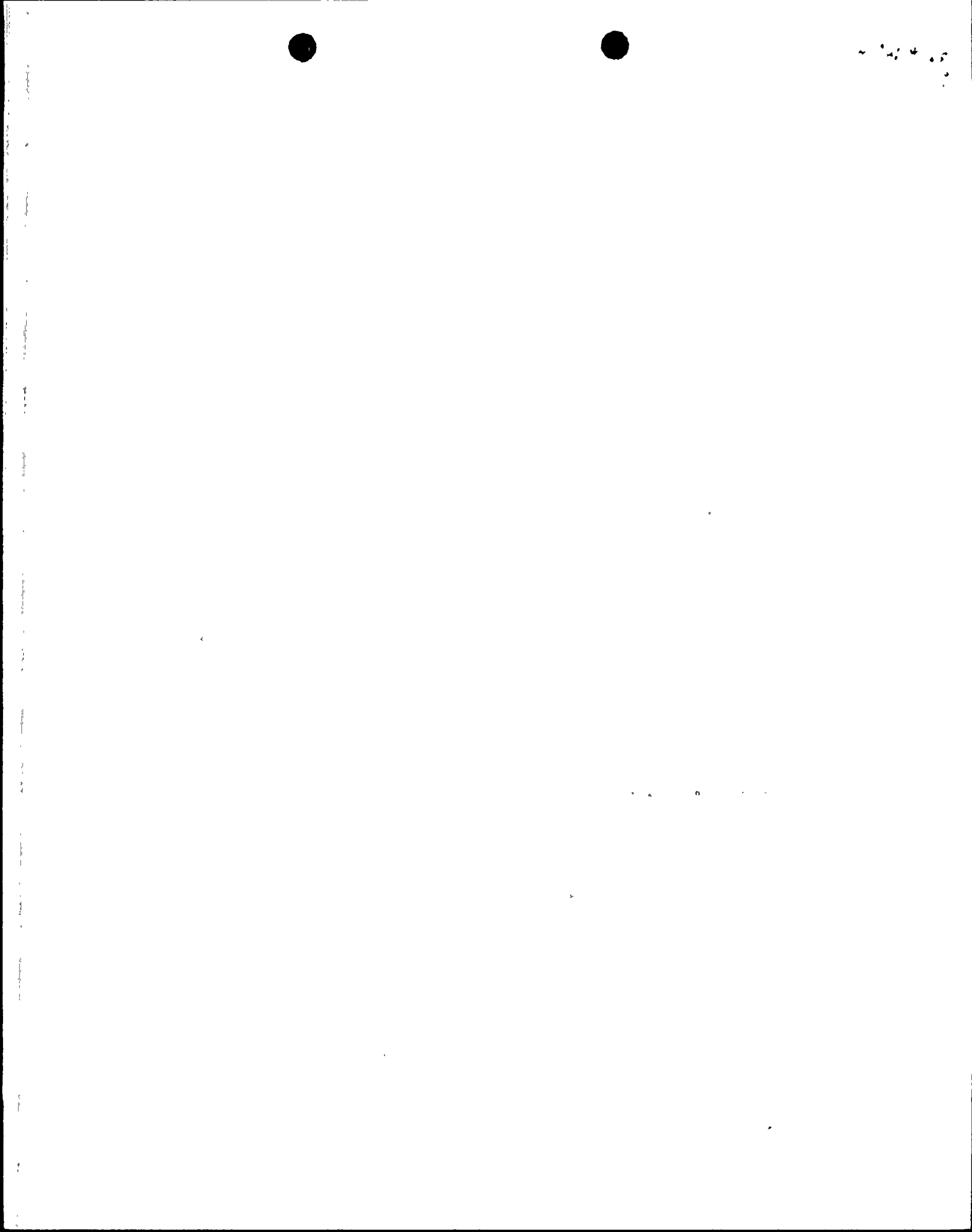
The revised Quality Assurance Program incorporating this change continues to describe the established requirements concerning record retention, location and assigned responsibility.

- B. ANSI N45.2.9-1974 provides general requirements and guidelines for the collection, storage, and maintenance of quality assurance records associated with the design, manufacture, construction, and operation phase activities of nuclear power plants. It is not intended to cover the preparation of the records, nor to include working documents not yet designated as quality assurance records. The requirements are intended to assure that records are available when needed for their intended purpose.





The revised Quality Assurance Program continues to satisfy the intent of ANSI N45.2.9 by providing reasonable protection against possible destruction or deterioration of records.



RESPONSE

Not applicable.

REGULATORY GUIDE 1.88: Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records (Revision 2, October 1976)

RESPONSE

INSERT A The position of Regulatory Guide 1.88 is accepted, with the exception that the dampers and doors are rated for 3 hours. (Four hour rated doors are not safe for employees due to self-actuating hydraulic closures.) Dampers are rated 3 hours to be compatible with the 3 hour doors. Additionally, NFPA-232 1980 is used in lieu of NFPA-232 1975. Vinyl-asbestos tile is used on the floor in lieu of a surface sealant.

REGULATORY GUIDE 1.89: Qualification of Class IE Equipment for Nuclear Power Plants (Revision 0, November 1974)

RESPONSE

Class IE equipment is qualified in accordance with IEEE 323-1974, IEEE Standard for Qualifying Class IE equipment for Nuclear Power Generating Stations. However, two clarifications to the guidelines presented in that document are necessary.

- A. For equipment that has been seismically qualified by the testing procedures referenced in FSAR section 3.10, prior to qualification testing to IEEE 323-1974, the seismic qualification of IEEE-323-1974 of the aged equipment is by analysis using the testing outlined in FSAR section 3.10 and, if necessary, appropriate supplemental tests as a basis for the analysis. This combined qualification is in accordance with Sections 5.3 and 5.4 of IEEE 323-1974. Justification for



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Insert "A" to FSAR Page 1.8-59

following exceptions to Section 5.6 of ANSI N45.2.9-1974:

- A. Dampers and doors are rated for three hours instead of four hours (four-hour rated doors are not safe for employees due to self-actuating hydraulic closures, and dampers are rated three hours to be compatible with the three-hour doors).
- B. Vinyl-asbestos tile is used on the floor in lieu of a surface sealant.
- C. The concrete floor and roof of record storage facilities are not provided with slope for drainage (halon suppression is provided making drainage unnecessary).
- D. Prior to storage in a permanent records facility, records may be retained in temporary working files under the following interim storage provisions for a period of not more than twenty-four months following completion of required processing and reviews:
  - a. in metal file cabinets within a fire protected building, or
  - b. in one-hour fire rated file cabinets within a non-fire protected building.



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