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 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Public 05000530

AUTH. NAME: VAN BRUNT, E. E. AUTHORITY AFFILIATION: Arizona Public Service Co.  
 RECIP. NAME: KNIGHTON, G. RECIPIENT AFFILIATION: Licensing Branch 3

SUBJECT: Forwards revised responses to NRC 830727 request for addl info re util. proposed rev to FSAR Section 1.8 concerning exceptions to Reg Guide 1.88 to permit use of records storage facility w/level concrete floor & roof.

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Arizona Public Service Company

P.O. BOX 21666 • PHOENIX, ARIZONA 85036

October 17, 1983  
ANPP-28013 - WFQ/JYM

Director of Nuclear Reactor Regulation  
Attention: Mr. George Knighton, Chief  
Licensing Branch No. 3  
Division of Licensing  
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: 83-056-026; G.1.01.10

Reference: (A) Letter from E. E. Van Brunt, APS, to D. M. Sternberg, NRC  
Region V, ANPP-24169, dated June 24, 1983.  
(B) Letter from W. F. Haass, NRC, to G. W. Knighton, NRC,  
dated July 27, 1983.

Dear Mr. Knighton:

A proposed revision to PVNGS FSAR Section 1.8 concerning exceptions to  
Regulatory Guide 1.88 was submitted in Reference (A). Reference (B)  
provided the results of your review of Reference (A) requesting  
additional information .

Attached are the revised responses.

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

Very truly yours,

*E. E. Van Brunt*

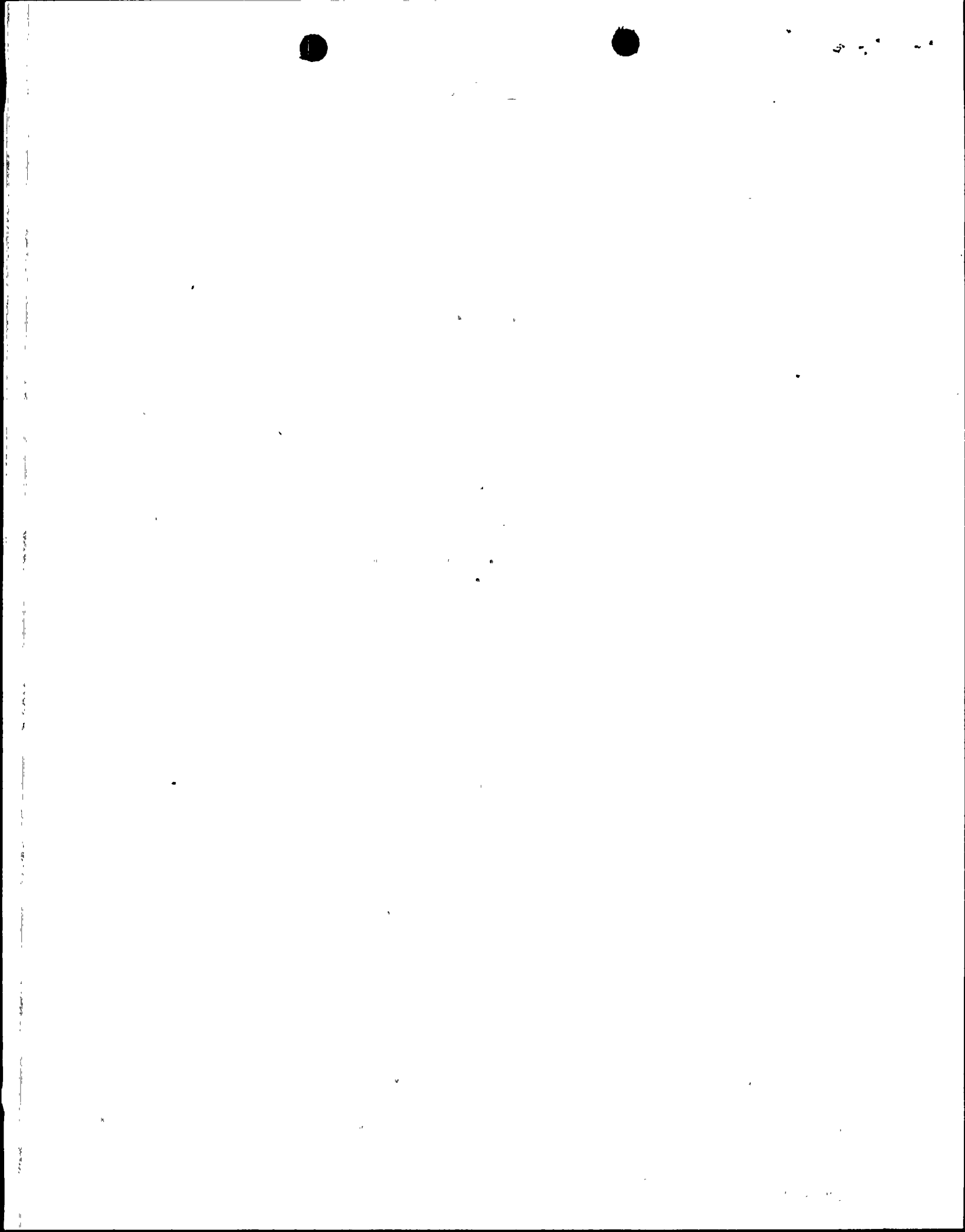
E. E. Van Brunt, Jr.  
APS Vice President  
Nuclear Projects Management  
ANPP Project Director

EEVB/JYM/sp  
Attachment

cc: E. A. Licitra (w/a)  
A. C. Gehr "  
J. Spraul "

*Boo!*

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October 17, 1983  
ANPP-28013 - WFQ/JYM

STATE OF ARIZONA )  
                  ) ss.  
COUNTY OF MARICOPA)

I, A. Carter Rogers, represent that I am Manager, 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 to do so, 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.

  
\_\_\_\_\_  
A. Carter Rogers

Sworn to before me this 17th day of October, 1983.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:

My Commission Expires April 6, 1987



0 2 3 4 5 6 7 8 9

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 N45.2.9-1974 by eliminating reference to NFPA-232,
- B. allows level concrete floor and roof in the records storage facility.
- C. changes the fire rating of doors, structure and frames, and hardware to conform with the minimum fire rating requirements of NQA-1.

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 N45.2.9-1974. 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 N45.2.9-1974.
- B. An exception is necessary to allow usage of a records storage facility with level concrete floor and roof. The facility is located on the first floor of a two-story building with basement. The building has provisions for adequate drainage. In addition, the facility uses a halon fire suppression system (no liquid) which makes provisions for drainage unnecessary. No piping or other source of water is located within the records storage facility.

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 N45.2.9-1974 by providing reasonable protection against possible destruction or deterioration of records.



IV. CLARIFICATION OF HOW WE COMPLY WITH RG 1.88

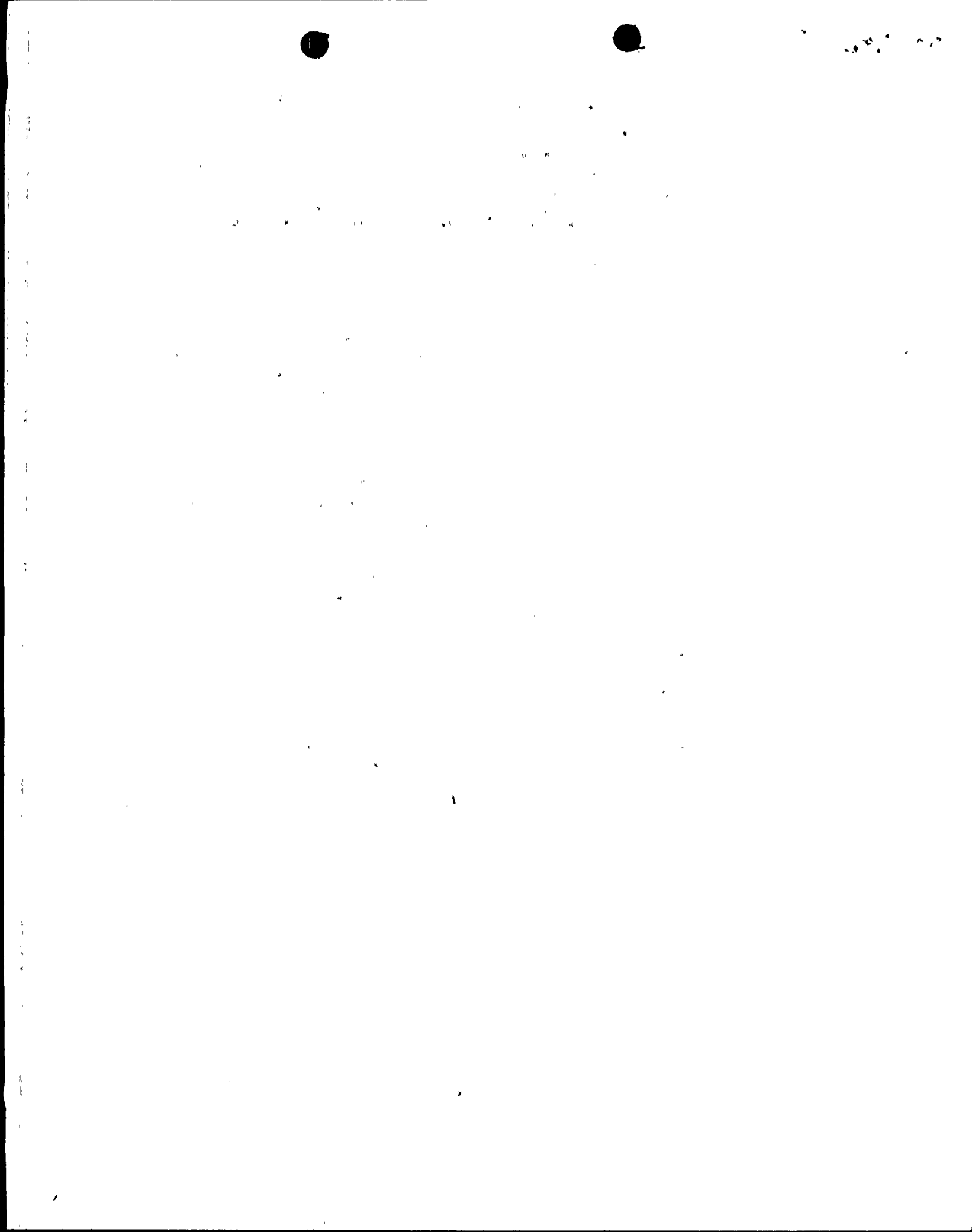
Establishment of a records turnover period is necessary since the Regulatory Guide and the endorsed standard do not prescribe the maximum acceptable interval for transferring records to the permanent storage facility. The records turnover period is as follows:

Upon Operating License (OL) issuance, originators of PVNGS documentation are required to turn over their records to the Nuclear Project Records Management Program (NPRM) within 120 days of completion for records retention and retrieval per prescribed NPRM procedures. Upon acceptance, NPRM will process and microfilm all incoming turnover of documentation within 90 days.

Records generated prior to OL issuance will be transferred to APS and stored in compliance with RG 1.88 within 24 months after the records are completed.

Establishment of a method for the control of records removed from storage is necessary, since ANSI N45.2.9 1974, Section 5.3, item 5 requires that storage procedures include rules governing access to and control of files. The control of records removed from storage is as follows:

- 1) Records may be checked out for no more than 5 working days.
- 2) When unattended, the records shall be locked in a file cabinet with a one-hour rating within a building with fire protection (e.g. sprinklers, halon, or CO<sub>2</sub>.)



Insert "A" to FSAR Page 1.8-59

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

- A. Doors, structure and frames, and hardware shall be designed to comply with the requirements of a minimum two-hour fire rating (Section 4.4.1 (c)) of Supplement 17S-1 of NOA-1 requires two-hour rated doors and dampers and the latest version of Regulatory Guide 1.28 (3/25/83) provides no additional guidance in this area.
- 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. No piping or other source of water is located within the records storage facility. The facility is located on the first floor of a two-story building with basement, having provisions for adequate drainage.)

