

JUN 5 1984

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: Procedure Generation Package for Palo Verde

By letter dated July 15, 1983, you submitted the Palo Verde Procedure Generation Package (PGP) to be used for preparing and implementing Emergency Operating Procedures (EOP) for Palo Verde. The Palo Verde PGP is based on the Combustion Engineering Owner's Group (CEOG) Emergency Procedure Guidelines which the staff has approved for use in preparing plant specific PGPs.

The staff has reviewed the Palo Verde PGP, as well as the additional information submitted by letter dated November 8, 1983, and finds that the Palo Verde PGP is acceptable for use in preparing and implementing EOPs, subject to the following three comments.

- (1) In your submittal, you state that the control room staff can implement the EOPs for any unusual condition that occurs in the plant during any mode of operation. However, the CEOG generic emergency procedure guidelines do not cover conditions other than off-normal events which require a reactor trip from power operation. Therefore, we require that you provide confirmatory information documenting the technical bases for extending the Palo Verde plant specific guidelines to all operating modes.
- (2) Our evaluation of the CEOG generic guidelines identified open issues. We will require that you appropriately update the Palo Verde plant-specific guidelines and EOPs to reflect any changes made to the CEOG generic guidelines as a result of resolving those open issues.
- (3) The validation and verification programs in the Palo Verde PGP did not clearly address how the programs would evaluate the adequacy of the existing instrumentation and controls since operator information and control requirements were not addressed. In response to this discrepancy

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(which also relates to our review of the task analysis process for the Palo Verde Detailed Control Room Design Review), by letter dated April 9, 1984, you provided a description on how operator information and control requirements were identified. This information is currently under staff review. You will be advised of the results after the review is complete.

Based on the status of the staff's review of the Palo Verde PGP, you can complete the preparation and implementation of the EOPs for Palo Verde. After the above three issues are resolved, you should revise the EOPs to reflect any changes that are required as a result of their resolution. Please note that if these items are not resolved prior to licensing for Palo Verde Unit 1, an appropriate condition will be included in the Unit 1 license.

If you have any questions regarding this letter, you should contact Manny Licitra the Licensing Project Manager.

Sincerely,

Original signed by
George W. Knighton

George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing

cc: See next page

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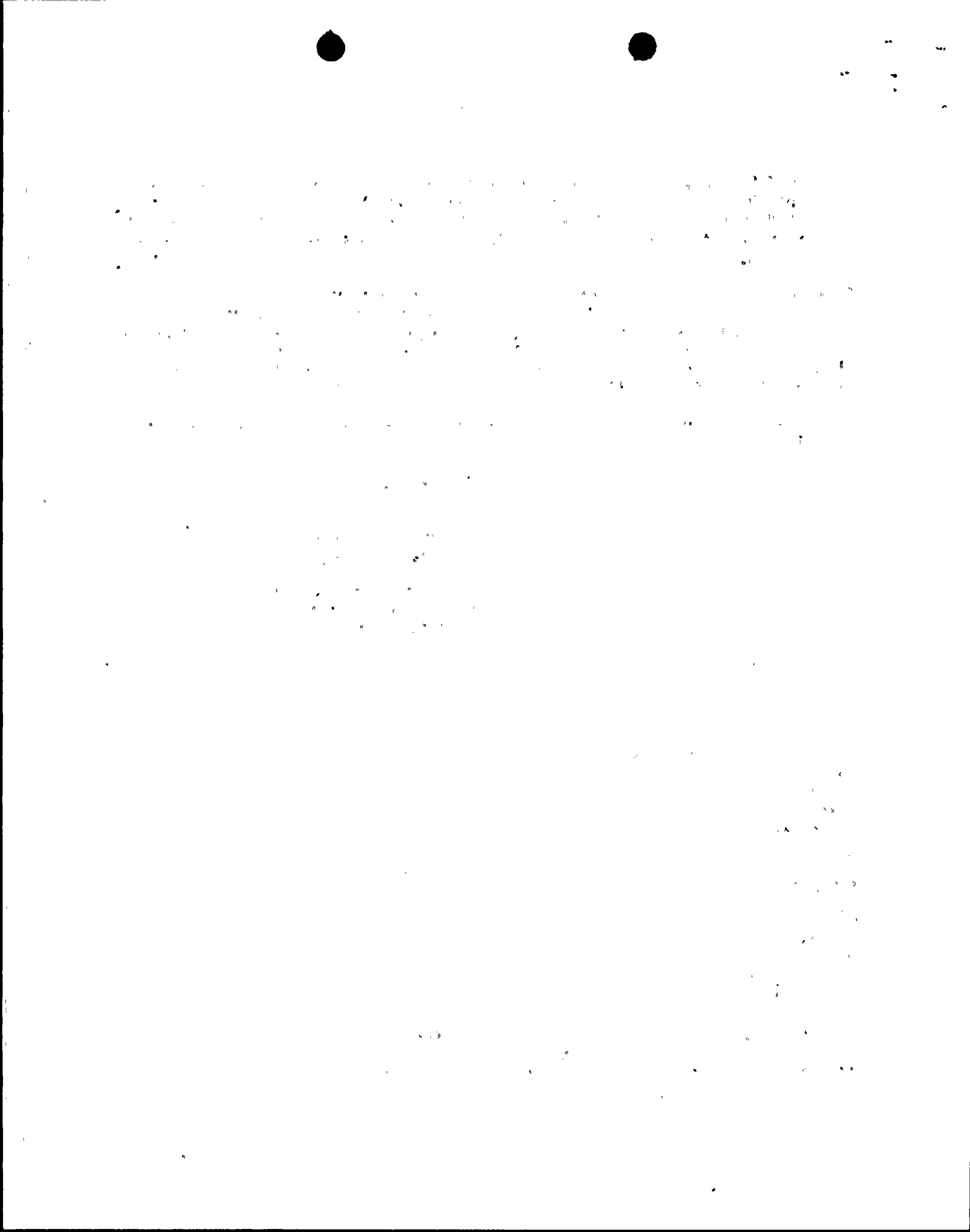
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Palo Verde

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1. The first part of the document discusses the general situation of the country and the role of the government in the development of the economy. It mentions the need for a comprehensive plan and the importance of the private sector.

2. The second part of the document focuses on the specific measures that have been taken to improve the economic situation. It details the implementation of various policies and the progress made in different sectors.

3. The third part of the document discusses the challenges that the country is facing and the strategies that are being implemented to address them. It highlights the need for continued reform and the importance of international cooperation.

4. The fourth part of the document provides a summary of the key findings and conclusions of the study. It emphasizes the need for a long-term perspective and the importance of maintaining the momentum of the reforms.