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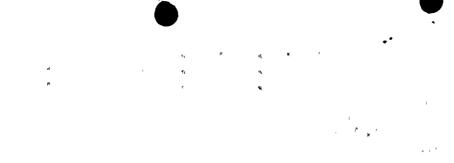
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## Arizona Public Service Company

October 5, 1984 ANPP-30751 EEVBJr/SRF

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 Augmented Shift Staffing Docket Nos. STN 50-528/529/530 File: 84-056-026; 84-002-493; G.1.01.10

Reference: (1) Letter from E. E. Van Brunt, Jr., APS, to Director, NRR, Attn. G. W. Knighton, dated August 20, 1984 (ANPP-30234-EEVBJr/ACG/bf)

Dear Mr. Knighton:

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We requested approval in Reference (1) for two temporary deviations related to staffing augmentation of NUREG-0654, Table B-1 emergency positions. During subsequent telephone conversations and a meeting held in your offices on August 30, 1984, comments and questions by the NRC Staff led us to modify our approach to augment the core/thermal hydraulics emergency response position. In lieu of the discussion of core/thermal hydraulics analysis capability presented in Reference (1), this capability will be provided on-shift by the Shift Technical Advisor (STA) and within 30 minutes, (off-site) by the Engineering Support, Reactor Analysis Staff, of the Corporate Emergency Center (CEC) (refer to Emergency Plan Section 4.2.4.13 and to Section 3.4 of Appendix H to the Emergency Plan as well as EPIP-57), at an ALERT or higher classification. The Core Analysis Emergency Support function of the CEC is located at the Nuclear Administration Building and will have available a computer used to do fuel and core analysis and an ERFDADS terminal. The Reactor Analyst position will subsequently be staffed at the TSC as discussed in Reference (1).

In addition, Note (g) of Tables 1, 2, and 3 (Appendix A to Attachment 1 of Reference (1) is deleted.

This change is requested as a permanent deviation. The Engineering Support function personnel assigned to the CEC to perform core/thermal analysis are members of a Nuclear Fuels Dept. and by education, experience and current job assignment are fully capable of performing the functions of core/thermal analysis. They have the expertise and tools avaliable to them to provide the requisit core analysis.

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Mr. Knighton Augmented Shift Starfing Page 2. ANPP- 30751

It is our understanding based on discussions with Falk Kantor of the Emergency Prepardness Branch, that the above change will resolve the SER Outstanding Issue related to augmented shift staffing. The information contained herein and in Reference (1) will be incorporated into a future revision of the PVNGS Emergency Plan.

If you have any further questions concerning this matter, please contact me at your earliest convenience.

Very truly yours,

mbunto

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

EEVBJr/SRF/GEC/bg

- cc: A. G. Gehr
  - E. A. Licitra
  - J, B. Martin
  - R. P. Zimmerman

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