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 FACIL:STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Public ~~05000528~~
 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Public 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Public 05000530
 AUTH.NAME AUTHOR AFFILIATION
 VAN BRUNT,E.E. Arizona Public Service Co.
 RECIP.NAME. RECIPIENT AFFILIATION
 KNIGHTON,G. Licensing Branch 3

SUBJECT: Forwards proposed change to Section 1.8 of FSAR,clarifying position to Reg Guide 1.58 & eliminating distinction between const & operational phase activities.

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Arizona Public Service Company

October 15, 1984
ANPP-30842 TFQ/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
Regulatory Guide 1.58 Clarification
File: 84-056-026; G.1.01.10

Dear Mr. Knighton:

Attached is a proposed change to Section 1.8 of the FSAR clarifying our position to Regulatory Guide 1.58 and eliminating the distinction between construction and operational phase activities.

The distinction between construction phase and operational phase activities relative to our commitment to Reg. Guide 1.58 in FSAR 1.8 will be eliminated since:

1. the exception to regulatory position C.1 clearly applies only to preoperational and startup tests;
2. the exception to regulatory position C.6 provides an alternative which could appropriately be applied to construction phase activities as well.

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

Very truly yours,



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

EEVBJr/JYM/nmo
Attachment

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

8410170060 841015
PDR ADCK 05000528
A PDR



ANPP-30842

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President, Nuclear Production 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.

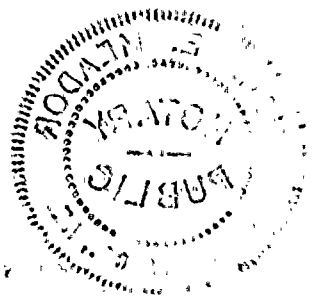
Edwin E. Van Brunt
Edwin E. Van Brunt, Jr.

Sworn to before me this 15 day of October, 1984.

Dora E. Meador
Notary Public

My Commission Expires:

My Commission Expires April 6, 1987



RESPONSE

Except as discussed below, concrete is placed in Category I structures in accordance with Regulatory Guide 1.55.

Creep tests are normally performed on prestressed structures only. Loss of prestress through creep is not applicable to non-prestressed structures.

REGULATORY GUIDE 1.56: Maintenance of Water Purity in Boiling Water Reactors (Revision 0, June 1973)

RESPONSE

Not applicable.

REGULATORY GUIDE 1.57: Design Limits and Loading Combinations for Metal Primary Reactor Containment System Components (Revision 0, June 1973)

RESPONSE

Not applicable. Each PVNGS unit utilizes a prestressed concrete primary containment.

REGULATORY GUIDE 1.58: Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel (Revision 1, September 1980)

| 5

RESPONSE

For construction phase activities, the position of Regulatory Guide 1.58 is accepted.

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REGULATORY GUIDE 1.58: Qualification of Nuclear Power Plant
Inspection, Examination and Testing
Personnel (Revision 1, September 1980)

4 RESPONSE

For operations phase activities the position of Regulatory
Guide 1.58 is accepted with the following exceptions

12 A. Position C.1:

The qualification of personnel who approve preopera-
tional and startup test procedures and test results,
and those who direct or supervise the conduct of
individual preoperational and startup tests is discussed
12 in section 14.2.2.12. The qualification of other per-
sonnel discussed in position C.1 follows the guidelines
4 of Regulatory Guide 1.8 as discussed in sections 13.1
and 13.2.

B. Position C.6

The specified education and experience recommendation of
ANSI N45.2.6-1978 for various levels of inspectors shall
not be treated as absolute when other factors provide
12 reasonable assurance that a person can competently perform
a particular task. These factors will be documented,
with justification by management (on an individual basis),
demonstrating that the individual does have equivalent
competence to that which would be gained from having the
required education and experience.

In addition, the following exceptions are taken to the refer-
enced standard ANSI N45.2.6-1978 are made:

- 4 A. The first sentence of paragraph 3.4 states that a
Level III qualified person shall have all the capa-
bilities of a Level II qualified person for the
inspection, examination or test category or class in

question. APS will qualify level III persons without the actual hands on experience and capability to perform specific inspections, examinations or tests required of a Level I or II qualified person, and utilize these persons for administrative and supervisory functions including certifying persons at the same or lower level.

- B. Paragraph 3.3 states that a Level II qualified person shall have demonstrated experience in certifying lower level qualified persons. APS does not use Level II qualified persons to certify lower level qualified persons, and does not require Level II qualified persons to demonstrate this capability.

The following interpretation is also made to Regulatory Guide 1.58.

A. Position C.1.

For qualification of personnel (1) who perform or approve operational test procedures and test results and (2) who direct or supervise the conduct of individual operational tests, the guidelines contained in Regulatory Guide 1.8, Rev. 1-R, "Personnel Selection and Training" with the criteria for selection and training contained in ANSI/ANS-3.1-1978, substituted for ANSI-N18.1-1971, will be followed. See also Conformance to Regulatory Guide 1.8: Personnel Selection and Training (Rev. 1-R May 1977).

