

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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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 marked-up FSAR pages consisting of minor changes clarifying 841015 proposed changes re Reg Guide 1.33.

DISTRIBUTION CODE: B001D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 66
 TITLE: Licensing Submittal: PSAR/FSAR Amdts & Related Correspondence

NOTES: Standardized plant. 05000528
 Standardized plant. 05000529
 Standardized plant. 05000530

RECIPIENT ID CODE/NAME	COPIES LTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTR ENCL
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NRR LB3 LA	1 0	LICITRA, E 01	1 1
INTERNAL: ACRS 41	6 6	ADM/LFMB	1 0
ELD/HDS3	1 0	IE FILE	1 1
IE/DEPER/EPB 36	1 1	IE/DEPER/IRB 35	1 1
IE/DQASIP/QAB21	1 1	NRR ROE, M. L.	1 1
NRR/DE/AEAB	1 0	NRR/DE/CED 11	1 1
NRR/DE/EHEB	1 1	NRR/DE/eqB 13	2 2
NRR/DE/GB 28	2 2	NRR/DE/MEB 18	1 1
NRR/DE/MTEB 17	1 1	NRR/DE/SAB 24	1 1
NRR/DE/SGEB 25	1 1	NRR/DHFS/HFEB40	1 1
NRR/DHFS/LQB 32	1 1	NRR/DHFS/PSRB	1 1
NRR/DL/SSPB	1 0	NRR/DSI/AEB 26	1 1
NRR/DSI/ASB	1 1	NRR/DSI/CPB 10	1 1
NRR/DSI/CSB 09	1 1	NRR/DSI/ICSB 16	1 1
NRR/DSI/METB 12	1 1	NRR/DSI/PSB 19	1 1
NRR/DSI/RAB 22	1 1	NRR/DSI/RSB 23	1 1
REG FILE 04	1 1	RGN5	3 3
RM/DDAMI/MIB	1 0		
EXTERNAL: BNL (AMDTS ONLY)	1 1	DMB/DSS (AMDTS)	1 1
FEMA-REP DIV 39	1 1	LPDR 03	1 1
NRC PDR 02	1 1	NSIC 05	1 1
NTIS	1 1		

1. The purpose of this document is to provide a comprehensive overview of the current state of the project and to identify the key areas for improvement. This document is intended for the use of the project team and management.

2. The project has been initiated to address the need for a more efficient and effective system. The project team has been working on this project for several months and has made significant progress. However, there are still several areas that need to be addressed.

3. The project team has identified the following key areas for improvement:

- 1. The current system is outdated and inefficient. It needs to be replaced with a more modern and effective system.
- 2. The current system is not scalable. It cannot handle the increasing volume of data and transactions.
- 3. The current system is not secure. It is vulnerable to data breaches and other security threats.
- 4. The current system is not user-friendly. It is difficult for users to learn and use.

4. The project team has developed a plan to address these issues. The plan includes the following key actions:

- 1. Conduct a thorough analysis of the current system and identify the areas for improvement.
- 2. Develop a new system that is modern, efficient, scalable, and secure.
- 3. Implement the new system and provide training to the users.
- 4. Monitor the performance of the new system and make any necessary adjustments.

5. The project team is confident that the new system will meet the needs of the organization and provide a significant improvement in efficiency and effectiveness. The project team is committed to ensuring the success of the project and to providing the highest quality of service to the organization.

6. The project team has identified the following key areas for improvement:

- 1. The current system is outdated and inefficient. It needs to be replaced with a more modern and effective system.
- 2. The current system is not scalable. It cannot handle the increasing volume of data and transactions.
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7. The project team has developed a plan to address these issues. The plan includes the following key actions:

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8. The project team is confident that the new system will meet the needs of the organization and provide a significant improvement in efficiency and effectiveness. The project team is committed to ensuring the success of the project and to providing the highest quality of service to the organization.

Item	Quantity	Description	Unit Price	Total Price
1	10	Item 1	100	1000
2	20	Item 2	200	4000
3	30	Item 3	300	9000
4	40	Item 4	400	16000
5	50	Item 5	500	25000
6	60	Item 6	600	36000
7	70	Item 7	700	49000
8	80	Item 8	800	64000
9	90	Item 9	900	81000
10	100	Item 10	1000	100000
11	110	Item 11	1100	121000
12	120	Item 12	1200	144000
13	130	Item 13	1300	169000
14	140	Item 14	1400	196000
15	150	Item 15	1500	225000
16	160	Item 16	1600	256000
17	170	Item 17	1700	289000
18	180	Item 18	1800	324000
19	190	Item 19	1900	361000
20	200	Item 20	2000	400000
21	210	Item 21	2100	441000
22	220	Item 22	2200	484000
23	230	Item 23	2300	529000
24	240	Item 24	2400	576000
25	250	Item 25	2500	625000
26	260	Item 26	2600	676000
27	270	Item 27	2700	729000
28	280	Item 28	2800	784000
29	290	Item 29	2900	841000
30	300	Item 30	3000	900000
31	310	Item 31	3100	961000
32	320	Item 32	3200	1024000
33	330	Item 33	3300	1089000
34	340	Item 34	3400	1156000
35	350	Item 35	3500	1225000
36	360	Item 36	3600	1296000
37	370	Item 37	3700	1369000
38	380	Item 38	3800	1444000
39	390	Item 39	3900	1521000
40	400	Item 40	4000	1600000
41	410	Item 41	4100	1681000
42	420	Item 42	4200	1764000
43	430	Item 43	4300	1849000
44	440	Item 44	4400	1936000
45	450	Item 45	4500	2025000
46	460	Item 46	4600	2116000
47	470	Item 47	4700	2209000
48	480	Item 48	4800	2304000
49	490	Item 49	4900	2401000
50	500	Item 50	5000	2500000
51	510	Item 51	5100	2601000
52	520	Item 52	5200	2704000
53	530	Item 53	5300	2809000
54	540	Item 54	5400	2916000
55	550	Item 55	5500	3025000
56	560	Item 56	5600	3136000
57	570	Item 57	5700	3249000
58	580	Item 58	5800	3364000
59	590	Item 59	5900	3481000
60	600	Item 60	6000	3600000
61	610	Item 61	6100	3721000
62	620	Item 62	6200	3844000
63	630	Item 63	6300	3969000
64	640	Item 64	6400	4096000
65	650	Item 65	6500	4225000
66	660	Item 66	6600	4356000
67	670	Item 67	6700	4489000
68	680	Item 68	6800	4624000
69	690	Item 69	6900	4761000
70	700	Item 70	7000	4900000
71	710	Item 71	7100	5041000
72	720	Item 72	7200	5184000
73	730	Item 73	7300	5329000
74	740	Item 74	7400	5476000
75	750	Item 75	7500	5625000
76	760	Item 76	7600	5776000
77	770	Item 77	7700	5929000
78	780	Item 78	7800	6084000
79	790	Item 79	7900	6241000
80	800	Item 80	8000	6400000
81	810	Item 81	8100	6561000
82	820	Item 82	8200	6724000
83	830	Item 83	8300	6889000
84	840	Item 84	8400	7056000
85	850	Item 85	8500	7225000
86	860	Item 86	8600	7396000
87	870	Item 87	8700	7569000
88	880	Item 88	8800	7744000
89	890	Item 89	8900	7921000
90	900	Item 90	9000	8100000
91	910	Item 91	9100	8281000
92	920	Item 92	9200	8464000
93	930	Item 93	9300	8649000
94	940	Item 94	9400	8836000
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96	960	Item 96	9600	9216000
97	970	Item 97	9700	9409000
98	980	Item 98	9800	9604000
99	990	Item 99	9900	9801000
100	1000	Item 100	10000	10000000



Arizona Nuclear Power Project

P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

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

November 15, 1984
ANPP-31141 WFQ/TFQ

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Docket Nos. STN-50-528/529/530
Exception to Regulatory Guide 1.33
File: 84-056-026; G.1.01.10

Reference: Letter from E.E. Van Brunt, Jr., APS, to G.W. Knighton, NRC,
(ANPP-30840), dated October 15, 1984

Dear Mr. Knighton:

The referenced letter transmitted proposed changes to the PVNGS FSAR concerning Regulatory Guide 1.33. As discussed with Mr. E.A. Licitra of your staff, additional minor changes are required to the previously proposed FSAR change, for clarification. The attached marked-up FSAR pages include these minor changes and supercede the referenced letter.

Please contact me if you have any questions on this matter.

Very truly yours,

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

EEVBJr/TFQ/no
Attachment

cc: E. A. Licitra w/a
A. C. Gehr w/a
R. P. Zimmerman w/a

8411190421 841115
PDR ADOCK 05000528
A PDR

Boo
11

November 15, 1984
ANPP-31141

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, Jr.

Sworn to before me this _____ day of _____, 1984.

Notary Public

My Commission Expires:

1. The first part of the report is a general introduction to the subject of the study. It discusses the importance of the study and the objectives of the research. It also provides a brief overview of the methodology used in the study.

2. The second part of the report is a detailed description of the study area. It provides information about the location of the study area, the population, and the socio-economic conditions.

3. The third part of the report is a detailed description of the study area. It provides information about the location of the study area, the population, and the socio-economic conditions.

4. The fourth part of the report is a detailed description of the study area. It provides information about the location of the study area, the population, and the socio-economic conditions.

5.

5. The fifth part of the report is a detailed description of the study area. It provides information about the location of the study area, the population, and the socio-economic conditions.

The following exception is taken to Section 3.4.2 of the referenced standard ANSI N18.7:

The APS commitment on the qualification of personnel who are performing preoperational and startup test functions is found in section 14.2.2.12.

In addition, the following interpretations of the referenced standard ANSI N18.7 are made:

A. Section 5.2.2: The requirements of this section are accepted with the following interpretations:

Temporary changes to procedures may be made provided the change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator License on the unit affected.

~~Procedural steps for which actions should be committed to memory are the immediate actions of the emergency procedures.~~ INSERT. 2

B. Section 5.2.13.1:

The requirement that changes made to procurement documents be subject to the same degree of control as was used in the preparation of the original documents is applied consistent with the requirements of ANSI N45.2.11, Paragraph 7.2. Minor changes to documents, such as inconsequential editorial corrections or changes to commercial terms and conditions, may not require that the revised document receive the same review and approval as the original documents.

C. Section 5.2.17:

The requirements of this section are accepted with the following interpretation:

The requirement that deviations, their cause, and any corrective action completed or planned shall be

INSERT 2

Procedural steps traditionally identified as immediate actions are incorporated into standard post trip actions. These actions are identified as ^{status checks} safety functions that ensure plant safety regardless of accident classification. Safety ^{status checks} functions, in the form of flow charts, will be provided on the control boards for ready use by the operators following any reactor trip.

4 | documented shall apply to significant deviations.
Other identified deviations will be documented and
corrected. This interpretation is consistent with
Appendix B to 10CFR50, Criterion XVI, Corrective Action.

The implementation of the positions of this Regulatory Guide
are described in chapters 13, 16, and 17.

D. Section 5.3.9.1
[INSERT 3]

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The requirements of this section are accepted with the following interpretation:

Actions identified as immediate operator actions have been standardized in the form of safety functions ^{status checks}. Safety functions are maintained for all transients when the emergency procedure is implemented. This ensures proper operator response independent of event diagnosis. This approach is consistent with CEN-152, CE Emergency Procedure Guidelines.

Actions identified as subsequent operator action are addressed as a recovery procedure, implemented after event diagnosis. This approach is consistent with CEN-152, CE Emergency Procedure Guidelines.

The specific procedure format and content has been identified in the Emergency Procedure Generation Package and submitted to the NAC for review. This is consistent with NUREG-0899.

1-11-61



1-11-61