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Arizona Nuclear Power Project

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REGION VICE

October 22, 1985
ANPP-33766-EEVB/WFQ/JKO

Mr. John B. Martin, Regional Administrator
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Docket Nos. STN 50-528 (License No. NPF-41)
Chapter 14 FSAR Change
File: 85-056-026; G.1.01.10

Dear Mr. Martin:

In accordance with 10CFR50.59(b) and license condition 2.c.(5), ANPP is submitting a change to PVNGS FSAR Section 14.2 for your information. The affected FSAR pages are attached.

This changes is being made to properly reflect the organization in the FSAR. It deletes the shift test director position and assigns those responsibilities to the responsible engineer who is directly involved with the testing.

A safety review and evaluation was done on this change and it has determined that there is no unreviewed safety question involved with the change.

If you have any further questions regarding this matter, please contact Mr. W. F. Quinn of my staff.

Very truly yours,

E. E. Van Brunt, Jr.
Executive Vice President
Project Director

EEVB/WFQ/JKO/tb
Attachment

cc: R. P. Zimmerman
E. A. Licitra
A. C. Gehr
M. Ley
Director of Inspection and Enforcement

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- Review and recommend approval of requests for construction and engineering modifications or changes required during the test program.
- Review progress of startup activities with contractors and vendors.
- Represent the Engineering Department on interdepartmental and interorganizational committees associated with the Startup test program.

14.2.2.5.2 Engineering Group Supervisors

- Supervise and/or coordinate the activities of their sections.
- Assign test responsibility to Responsible Engineers.
- Maintain liaison with contractors and vendors to coordinate their activities relating to the preoperational test program.
- Direct the work of the C-E NSSS technical personnel assigned during Phase II through IV test program.
- Request, coordinate, and monitor vendor representative assistance, as required.
- Review and recommend approval of test procedures, test procedure modifications, and test results in accordance with established procedures.

14.2.2.5.3 Test Program Director

- Direct the performance of testing activities through the ~~Shift Test Directors~~ assigned *Responsible Engineers*
- Ensure that required records, reports, test results and other documents are prepared, *reviewed* and routed as required by Station Manual procedures.



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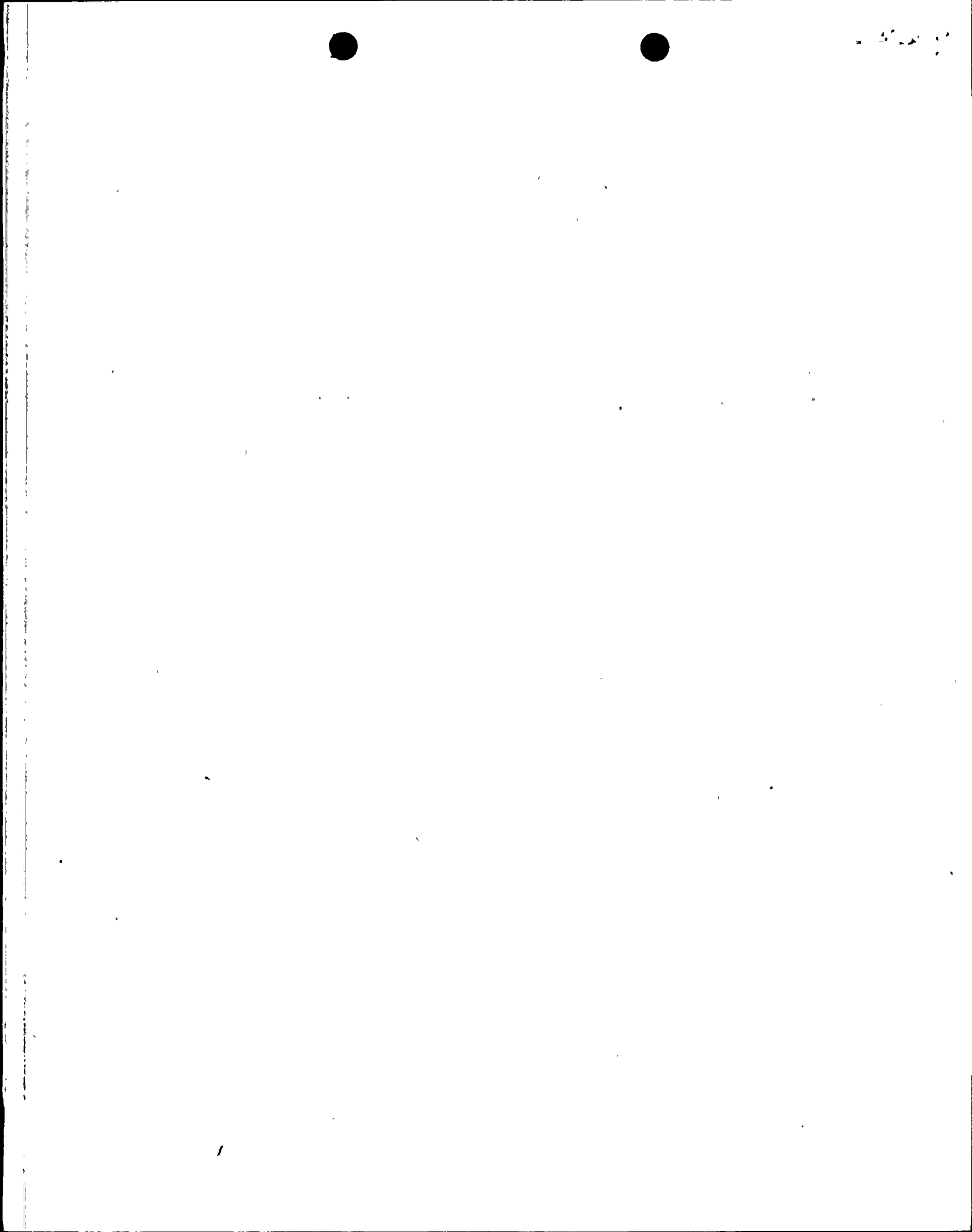
- Recommend plant scheduling changes and work arounds as necessary to support the testing effort.
- Assure that required startup materials, instrument and consumable supplies are available to support scheduled startup activities.
- Coordinate the preparation and maintenance of Phase II through IV startup test procedures with assigned station groups.
- Issue periodic progress reports and work schedules for Phase II through IV activities.
- Issue special reports concerning startup activities as directed by the Engineering Manager.

14.2.2.5.4 ~~Shift Test Directors~~*Delete*

- Represents the Test Program Director on shift.
- Directs testing activities of Responsible Engineers on shift in coordination with the Shift Supervisor.
- Implement the startup schedule on shift.
- Review maintenance/surveillance activities on shift for impact on scheduled testing.
- Provide interim approval of test procedure changes with the Shift Supervisor.
- Provide interim approval of Test Exception Reports.

14.2.2.5.5 Responsible Engineers

- Assures that assigned test procedures are written, reviewed, and approved in accordance with the Station Manual as scheduled.
- Assures all prerequisites for assigned tests are completed prior to the performance of the test.



SPECIFIC INFORMATION TO
BE INCLUDED IN FSAR

- Conducts assigned tests using and insuring compliance with approved test procedures.
- Keeps the Test Program Director informed of the status of the preparation and performance of assigned tests.
- Suspends testing if the test cannot safely be conducted as written until the problem is resolved.
- Signs off individual steps in test procedures and ensures that required data is recorded.
- Assures that required startup materials, instruments, and consumables are available to support scheduled startup activities.
- Conducts pre-test and pre-shift startup briefings.

14.2.2.6 Combustion Engineering *A Responsible Engineer will be assigned by the Test Program Director to provide overall direction for all testing activities on each shift,*

C-E will provide onsite technical assistance to Arizona Public Service Company during the installation, startup, testing, and initial operations of each NSSS. Through this effort, C-E aids APS and assures itself that each NSSS is installed, started, tested, and operated in conformance with design intent. C-E onsite personnel provide technical assistance and act as technical liaison with C-E Headquarters to resolve problems within C-E scope. C-E provides a member of the Test Working Group. C-E will review and comment on test procedures involving their scope of supply.

14.2.2.7 Bechtel Power Corporation (BPC)

BPC, under the direction of Arizona Public Service Company, has been designated as the Engineer-Constructor of PVNGS. As the Engineer, BPC will provide a representative to serve as a member of the Test Working Group, and staff augmentation addressed in section 14.2.2. As the Constructor, BPC will coordinate the construction schedules with Test Program requirements and

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SPECIFIC INFORMATION TO
BE INCLUDED IN FSAR

B. Minimum qualifications of individuals that direct or supervise the conduct of individual Phase II through IV tests: | 2
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1. At the time of assignment to the function, the individual should have a Bachelor's Degree in engineering or the physical sciences or the equivalent, and 2 years of applicable power plant experience of which at least 1 year shall be applicable nuclear power plant experience, or, | 2

2. A high school diploma or the equivalent and 5 years of applicable power plant experience of which at least 2 years shall be applicable nuclear power plant experience. Credit for up to 2 years of non-nuclear experience may be given for related technical training on a one-for-one time basis, or, | 9

3. Written authorization from the PVNGS Plant Manager that the individual is qualified to supervise or direct specific Phase II through IV test(s), based on a case-by-case evaluation of the individual's qualifications relative to the specific test(s). In ^{all} cases a ~~Shift Test~~ ^{Responsible} ~~Engineer~~ ^{Director} who is qualified per 1 or 2 above, will be available for consultation regarding the specific test. | 14
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Included in the experience should be at least 3 months of indoctrination/training in nuclear power plant systems and component operation of a nuclear power plant that is substantially similar in design to PVNGS. In addition the individual will undergo indoctrination/training on the PVNGS plant. | 8

C. Minimum qualifications of individuals assigned to groups responsible for review and approval of Phase I Test procedures and/or review and approval of test results. | 2
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