



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE
WALNUT CREEK, CALIFORNIA 94596-5368

June 25, 1993

Arizona Public Service Company
P. O. Box 53999, Station 9012
Phoenix, Arizona 85072-3999

Attention: Mr. William F. Conway
Executive Vice President, Nuclear

Subject: OPERATIONS QUALITY ASSURANCE PLAN FOR PALO VERDE
NUCLEAR GENERATING STATION (PVNGS) UNITS 1, 2 AND 3

We have reviewed Amendment 1 to the PVNGS Operations Quality Assurance (QA) Plan that you submitted to us on April 27, 1993. We have two questions concerning Amendment 1 that are contained in an enclosure to this letter. Additional Arizona Public Service review of Amendment 1, and justification or clarification addressing the questions provided in an enclosure to this letter is needed.

The completion of our review will depend on the satisfactory responses to the questions provided in the enclosure to this letter. Should you have any questions regarding our review, please contact W. J. Wagner at (510) 975-0313.

Sincerely,

K. E. Perkins, Jr., Director
Division of Reactor Safety and Projects

cc:
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Enclosure

NRC Region V Questions Regarding Palo Verde Nuclear Generating Station Updated Quality Assurance Plan - Amendment 1

1. Quality Assurance Program Approval

The approval signatures of the Director of Quality Assurance, and of the Executive Vice President, Nuclear, have been deleted in Amendment 1 to the QA Plan. As a consequence, it is no longer evident who approved the plan nor that senior level management is endorsing the QA Plan, a top tier QA document.

Is the QA plan approved by the Director of Quality Assurance and the Executive Vice President, Nuclear? Whose "Policy Statement" is contained in page 1 of the QA plan?

2. Quality Assurance Plan / Technical Specifications Consistency

Section 2.9.3, Amendment 1, page 19, last sentence states, in part, that "Independent Safety Engineering reports of evaluations and assessments shall be prepared, approved, and transmitted to the Director, Quality Assurance..." Technical Specification (TS) 6.2.3.4 requires the Independent Safety Engineering Department (ISE) to make detailed recommendations to the Director, Nuclear Safety. The current approved QA Plan has ISE reporting to the Director, Nuclear Safety. Amendment 1 moves ISE to the QA Department. Appendix "C", Terms and Definitions, of Amendment 1 contains a definition of ISE that does not accurately reflect the ISE functions required by TS 6.2.3.1.

Has the TS been reviewed to determine what requirements are being affected by Amendment 1 and to determine if a TS change is required? Has a TS change request been submitted to the NRC on this subject?

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K. E. Perkins, Jr., Director
Division of Reactor Safety and Projects

<i>WJW</i> WAGNER _____	<i>WPA</i> ANG _____	<i>HWONG</i> HWONG _____	<i>LMILLER</i> LMILLER _____	<i>PERKINS</i> PERKINS _____
6/25/93	6/25/93	6/25/93	6/25/93	6/25/93

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