

ARIZONA



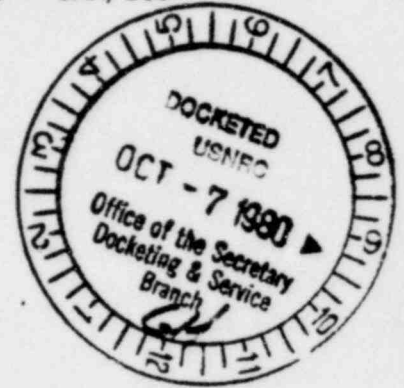
PUBLIC SERVICE COMPANY

P. O. BOX 21666 · PHOENIX, ARIZONA 85036

September 24, 1980  
ANPP-16425 - JMA/ECS

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DOCKET NUMBER  
PROPOSED RULE PR 50  
(45 FR 54708)



The Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Docketing and Service Branch

Re: NUREG-0696 (45 Federal Register 54708)  
File: 80-010-026

Dear Sir:

The purpose of this letter is to provide the comments of the Arizona Public Service Company on the Nuclear Regulatory Commission's proposed "Functional Criteria for Emergency Response Facilities" contained in draft report NUREG-0696. Our comments are given on the attached enclosure entitled "Comments on Draft Report NUREG-0696."

Very truly yours,

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

EEVBJr/ECS/av  
Attachment

- cc: J. M. Allen
- A. C. Rogers
- W. F. Quinn
- J. P. Shrewsberry
- F. W. Hartley
- A. C. Gehr
- G. C. Andognini

L-4-1, PT50

Acknowledged by card... 10/6/80

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ARIZONA PUBLIC SERVICE COMPANY

COMMENTS ON DRAFT REPORT NUREG-0696

45 FEDERAL REGISTER 54708 (AUGUST 15, 1980)

1. Section II.F requires a Limiting Condition of Operation in the Technical Specifications be established for SPDS unavailability. There is an ambiguity as to the scope of unavailability being addressed. The SPDS has displays required in the TSC and EOF. The absence of the SPDS in either of these two locations does not necessarily reduce the effectiveness of the TSC and EOF to perform their function. If the SPDS is operational in the Control Room, its primary functional goal is met.

It is, therefore, recommended that the scope of the SPDS unavailability be restricted to the output in the Control Room.

2. Section II.F indicates that "detailed guides for preparation of performance specifications for the SPDS...will be published separately." To stay with the intent of NUREG-0696 to be a functional document and not a design specific document, it is recommended that the details of the construction and operation of the SPDS system be left to the individual utilities. The criteria given in the subject document provides sufficient direction to supply an SPDS that will function to give the operator the necessary system visibility.
3. Sections I.C, III.I and IV.I restricts the use of plant process computers to process data prior to its use in the SPDS, TSC or EOF. The basis of your requirement is in the lack of software security, and the poor reliability of past process computers. This is a valid concern, but new technology would allow the new generation of process computers to be useful.

Process computers in older designs of nuclear power plants were unreliable with very little program and data security. Current designs of hardware/software have enhanced reliability significantly. Design of the plant process data gathering equipment with state-of-the-art computer design is allowable.