

ARIZONA



PUBLIC SERVICE COMPANY

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G. CARL ANDRONINI
VICE PRESIDENT
ELECTRIC OPERATIONS

September 28, 1981

DOCKET NUMBER

PROPOSED RULE

PR-Misc. Notice
(NUREG-0799)
(46 FR 34735)

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

Attn: Docketing and Service Branch

Subject: Comments on 10CFR Part 50 Proposed
46 FR 34735
July 2, 1981

Dear Sir:

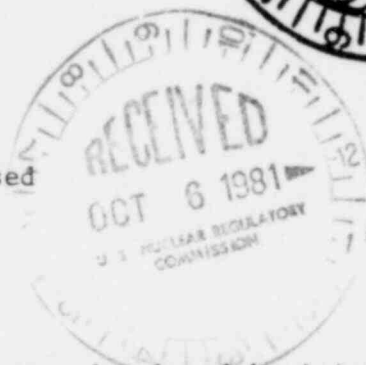
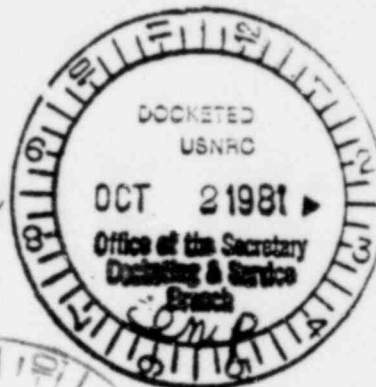
Enclosed are comments on NUREG-0799 which were developed by Arizona Public Service Company as requested in the Federal Register dated July 2, 1981, Page 46 FR 34735.

NUREG-0799 provides a format that either directly or indirectly prescribes a singular approach for emergency operating procedures. This singular approach or functional recovery path as prescribed in NUREG-0799, does not give an operator flexibility in those instances when a diagnosis is immediately possible. For those cases, an event-oriented approach is advantageous and would result in a more expeditious plant recovery.

NUREG-0799 neglects the importance of the operator's training background. Emergency operating procedures of a different format from normal operating procedures would complicate operation training and increase the probability of improper response. The accuracy in plant operations cannot be assumed by implementing the use of procedures which require a new orientation to plant emergency conditions. Plant safety is dependent on training of operations personnel. No emergency operations procedures prescription can replace operator training.

Redrafting all operating procedures would be a massive job that could not be justified on safety grounds.

NUREG-0799 is a useful format reference, but should not be made mandatory and does not provide useful criteria for the NRC staff to evaluate emergency operating procedures.



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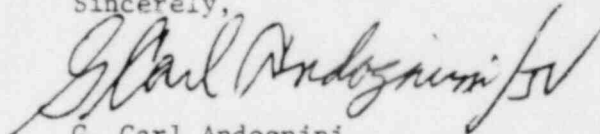
PDR

Secretary of the Commission
September 28, 1981
Page 2

We recommend that if a plant's emergency operating procedure is in conformance with 10CFR50.34(b)(6)(v), that this procedure not be scrutinized because of the use of criteria different from those incorporating the resolution of public comment on NUREG-0799.

If you have any questions, please contact Mr. Steven Robert Frost at (602) 271-3348.

Sincerely,

A handwritten signature in dark ink, appearing to read "G. Carl Andognini". The signature is fluid and cursive, with a large initial "G" and a stylized "A".

G. Carl Andognini
Vice President
Electric Operations

GCA/JRP/jc

Enclosure

cc: J. D. Kerrigan - NRC