



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Frank J. Miraglia
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SRP
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17.1-20

AUG 31 1982

Docket Nos. 50-528
50-529
50-530

MEMORANDUM FOR: Frank J. Miraglia, Chief
Licensing Branch #3
Division of Licensing

FROM: Walter P. Haass, Chief
Quality Assurance Branch
Division of Engineering

SUBJECT: QAB POSITION ON PALO VERDE FSAR AMENDMENT 9

Amendment 9 to the Palo Verde FSAR revised the QA organization for the operations phase as the applicant had indicated by letter of June 1, 1982. Our SER supplement of July 1, 1982 reflected the acceptability of this change.

Amendment 9 also revised the applicant's commitment regarding the accuracy of calibration standards, such that the commitment is no longer acceptable. (See FSAR page 17.2-56, Amendment 9, August 1982). To be acceptable, justification must be provided for the applicant's position or the 2nd and 3rd paragraphs of page 17.2-56 must be revised as follows:

"Calibrations of permanent plant equipment, M&TE and Calibration Standards shall be performed with the item used to calibrate having inaccuracy ~~equal to or~~ better than the item being calibrated.

"In addition, there shall be ~~three~~ four to one ratio of inaccuracies between either:

- (1) An item of M&TE used to calibrate permanent plant equipment and the calibration standard used to calibrate that item of M&TE (e.g. if M&TE inaccuracy is $\pm 1\%$, the calibration standard inaccuracy must be ~~$\pm 1/3$~~ $\pm .25\%$ or less).

OR

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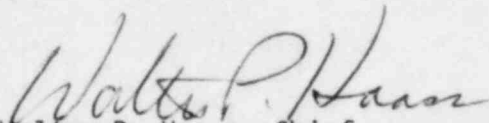
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- (2) An item of permanent plant equipment and the M&TE used to calibrate that item of permanent plant equipment (e.g. If permanent plant equipment inaccuracy is $\pm 1/8\%$, M&TE inaccuracy must be $1/8 \pm .25\%$)." 1/8

Jack Spraul of my staff informed the applicant's QA organization (Kaplan) of this problem on August 25, 1982.


Walter P. Haass, Chief
Quality Assurance Branch
Division of Engineering

cc: E. Licitra