

TRANSMITTAL OF MEETING HANDOUT MATERIALS FOR IMMEDIATE PLACEMENT IN THE PUBLIC DOMAIN

*This form is to be filled out (typed or hand-printed) by the person who announced the meeting (i.e., the person who issued the meeting notice). The completed form, and the attached copy of meeting handout materials, will be sent to the Document Control Desk on the same day of the meeting; under no circumstances will this be done later than the working day after the meeting.
Do not include proprietary materials.*

DATE OF MEETING

02/24/2000

The attached document(s), which was/were handed out in this meeting, is/are to be placed in the public domain as soon as possible. The minutes of the meeting will be issued in the near future. Following are administrative details regarding this meeting:

Docket Number(s)	<u>50-528, 50-529, and 50-530</u>
Plant/Facility Name	<u>Palo Verde Nuclear Generating Station, Units 1, 2, and 3</u>
TAC Number(s) (if available)	<u>N/A</u>
Reference Meeting Notice	<u>February 14, 2000 meeting notice</u>
Purpose of Meeting (copy from meeting notice)	<u>Use of Appendix J testing to satisfy the NRC conditions placed on the use of ASME Code Case N-522</u>

NAME OF PERSON WHO ISSUED MEETING NOTICE

Mel Fields

TITLE

Project Manager

OFFICE

NRR

DIVISION

DLPM

BRANCH

PDIV-2

Distribution of this form and attachments:

Docket File/Central File

PUBLIC

DF03

Arizona Public Service Company

First 10-Year Interval Inservice Inspection Program Relief Request No. 7 Containment Penetration Testing



Code Requirement

- Table IWC-2500-1 Category C-H, all pressure retaining components
- Test required: IWC-5221/22 (System Pressure Test/System Hydrostatic Test)
- Exam Method: Visual, VT-2
- Acceptance Criteria: IWA-5240
- Frequency: Each inspection interval



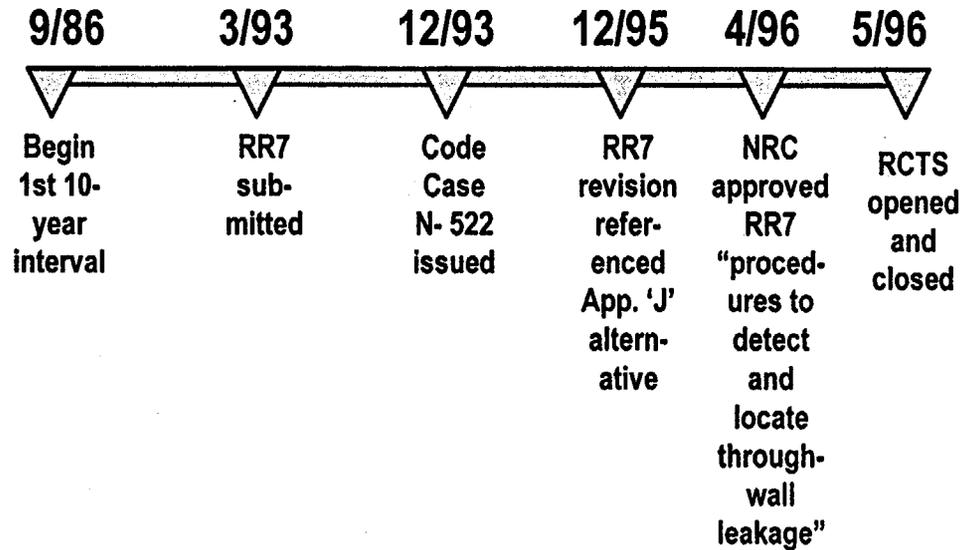
Alternative Examination Requested

- Use App. J testing in lieu of VT-2
- App J testing routinely performed on applicable containment piping penetrations
- This testing is more conservative than the VT-2 examination required by the code
- Local Leak Rate Testing is significantly more sensitive than a visual examination for leakage
- Reference Code Case N-522 for the ASME Code interpretation



Palo Verde ISI

10-Year Interval Timeline



SER Conditions:

April 1996 Safety Evaluation - RR #7

- Test at calculated peak containment pressure
- Test using procedure that provides for detection and location of through-wall leakage in the pipe segments being tested



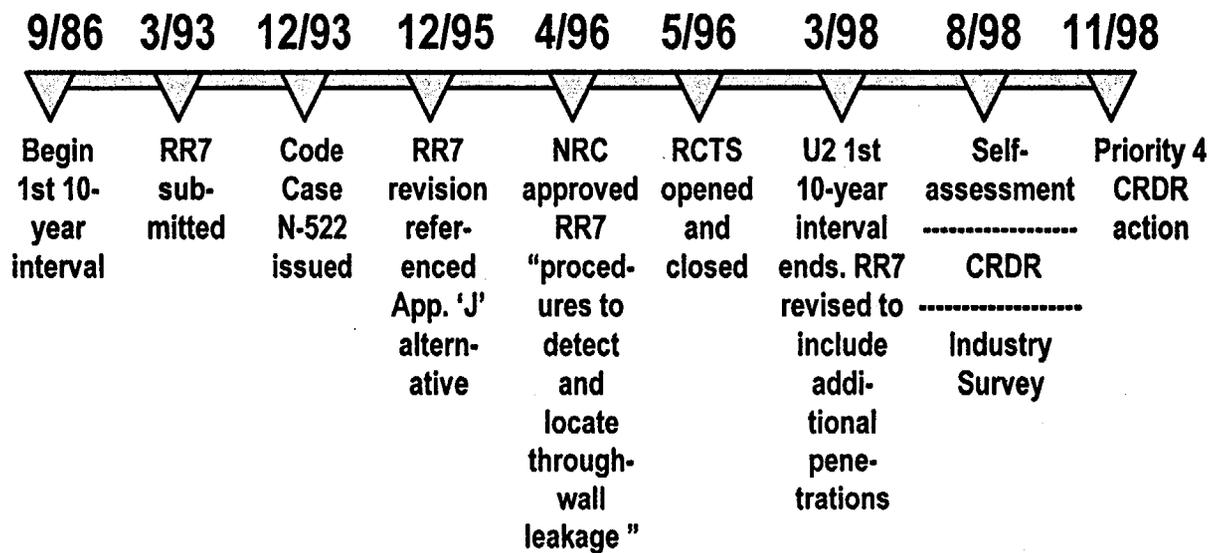
APS Implementation

- LLRT Test Procedure 73ST-9CL01
 - Peak containment pressure
 - Detects leakage through piping and CIVs
 - Ensures safety function
- Visual examination procedure 73TI-9ZZ13
 - If leakrate is unacceptable and cannot be evaluated, then ISI is contacted to investigate accessible piping



Palo Verde ISI

10-Year Interval Timeline



APS Self-Assessment of ISI Program

- Issue of complying with Relief Request No. 7 reviewed
 - Documented in CRDR 981412
 - Documented ISI Implementation of SER requirements
 - Performed industry survey to benchmark current practice

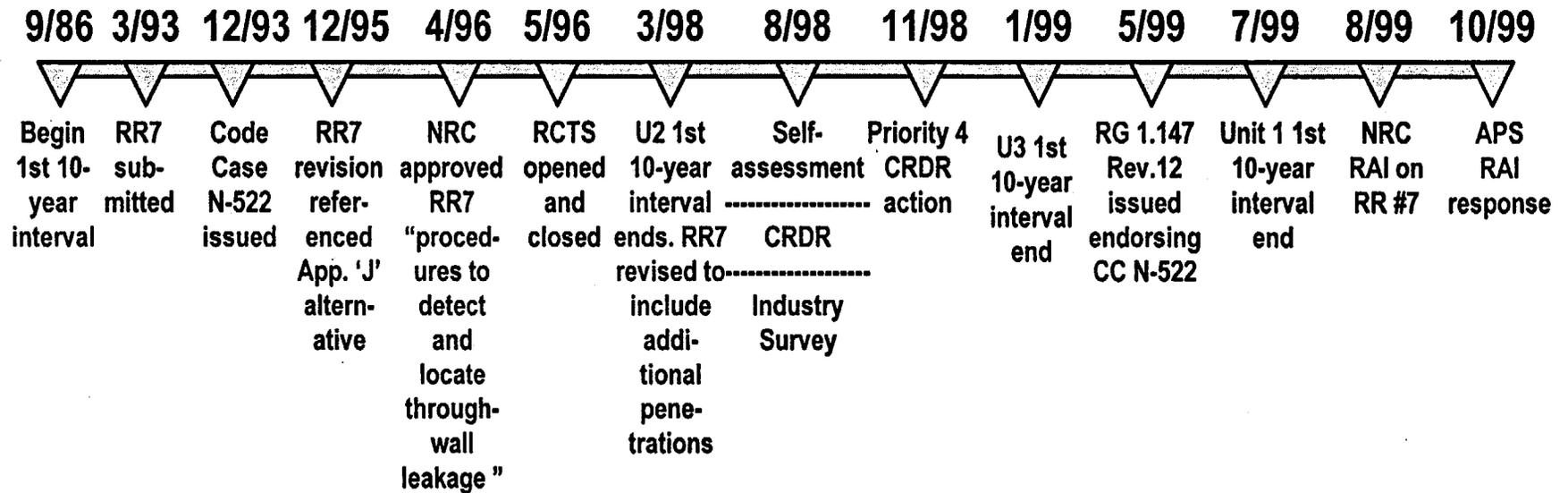


Industry Survey

- 16 plants contacted
 - ten plants had similar relief
 - six reported no specific actions addressing through-wall pipe leakage
 - one plant performing limited snoop only if significant change in leak rate
 - one plant adding to procedure to snoop accessible areas
 - one plant addresses through-wall leakage with UT listening device
 - one plant using VT-2 certified LLRT test personnel



Palo Verde ISI 10-Year Interval Timeline



APS RAI Response - Oct. 1999

- Response was consistent with APS' implementation of SER Conditions
- APS applies the "locate" procedure (i.e. ISI Visual Inspection Procedure) only when leakage cannot be evaluated by the LLRT Engineer



Technical Adequacy

- Appendix J testing achieves purpose of pressure testing containment penetrations
 - ensures 10CFR100 limits not exceeded
- Systems connected to Class 2 penetrations by non-class connecting pipe do not perform a safety function during DBA conditions
- Appendix J program ensures safety function



Resolution of Issue for First 10-Year Interval ISI Program

- APS' implementation of SER conditions for Relief Request No. 7 were consistent and technically adequate
- No safety issue regarding the ability of the penetrations to perform their required function



SUMMARY

- Need to resolve Relief Request No. 7 issue for completion of first 10-Year Interval ISI Program
- APS' implementation of SER conditions for Relief Request No. 7 were consistent w/ industry and technically adequate
- Safety function of penetrations demonstrated



Headquarters Document Processing Center - HQ DPC Document Return Sheet

TO: _____

DATE: 3/1/00

The attached document was not submitted in accordance with guidance provided in the December 30, 1999 All Employee Announcement entitled ADAMS DEPLOYMENT - STATUS UPDATE (<http://www.internal.nrc.gov/NRC/ANNOUNCE/YELLOW/1999-108.html>) and is being returned to the originating office for appropriate action.

Reason for Rejection:

- A final template exists for this document, but was not noted on the document. (NRC staff are required to note the appropriate template number on the front page)
- A final template exists for this document, but the ADAMS accession number was not noted on the document. (NRC staff are required to note the accession number on the front page)
- The Document Class has not been changed to "Official Record." (NRC staff are required to change the "Document Class" and "declare an official record" on internally generated documents that have final templates established)
- The document has not been "declared an official record." (NRC staff are required to "declare an official record" on internally generated documents that have final templates established)
- A final template exists for this document, but the document could not be found in ADAMS. (NRC staff are required to add these documents to ADAMS. It may be the "Security Access" was not properly set)

Please take the appropriate action to resolve this/these issues and return the document to the OCIO/Document Control Desk (DCD) along with this form. Please check the box below, indicating that the corrections have been made.

Corrections have been made!

If you have any questions regarding this matter, please contact the DCD staff at 415-2076.

No Accession #, No template noted.

pcu