

March 14, 2000

LICENSEE: Arizona Public Service Company

FACILITY: Palo Verde Nuclear Generating Station, Units 1, 2, and 3

SUBJECT: SUMMARY OF MEETING HELD ON FEBRUARY 24, 2000, TO DISCUSS THE USE OF APPENDIX J TESTING TO COMPLY WITH ASME CODE CASE N-522

On February 24, 2000, the NRC and the Palo Verde licensee, Arizona Public Service Company, met in Rockville, Maryland, to discuss the conditions placed by the NRC on the use of Appendix J testing to meet American Society of Mechanical Engineers (ASME) Code Case N-522 requirements. Code Case N-522 states that the use of Appendix J testing is an acceptable alternative to pressure testing piping that penetrates containment when the piping and isolation valves that are part of the containment system are Class 2, but the balance of the piping system is outside the scope of ASME Section XI. Specifically, the meeting focused on the NRC condition that stated the test procedure should permit the detection and location of through-wall leakage in containment isolation valves and pipe segments between these valves. The licensee discussed its procedures for conducting Appendix J testing of penetrations and the additional actions taken when measured leakage exceeded administrative limits. The licensee also presented the results of a limited industry survey to illustrate that other licensees had a similar interpretation of the NRC condition placed on the use of Code Case N-522.

Enclosure 1 is the list of attendees for the meeting, and Enclosure 2 is a copy of the slides presented by the licensee.

/RA/

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Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-528, STN 50-529,
and STN 50-530

Enclosures: 1. List of Meeting Attendees
2. Licensee's Meeting Slides

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Palo Verde Generating Station, Units 1, 2, and 3

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MEETING ATTENDANCE

PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2 AND 3

USE OF APPENDIX J TESTING TO MEET ASME CODE CASE N-522

NRC/APS

FEBRUARY 24, 2000

ARIZONA PUBLIC SERVICE COMPANY

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M. Steve Coppolk
Mike Melton
Saragrace Knauf

ROCHESTER GAS AND ELECTRIC CORPORATION

Frank Schaaf

NRC

Bill Bateman
Ted Sullivan
John Huang
Tom McLellan
Mel Fields
Steve Dembek

Arizona Public Service Company

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

Enclosure 2



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



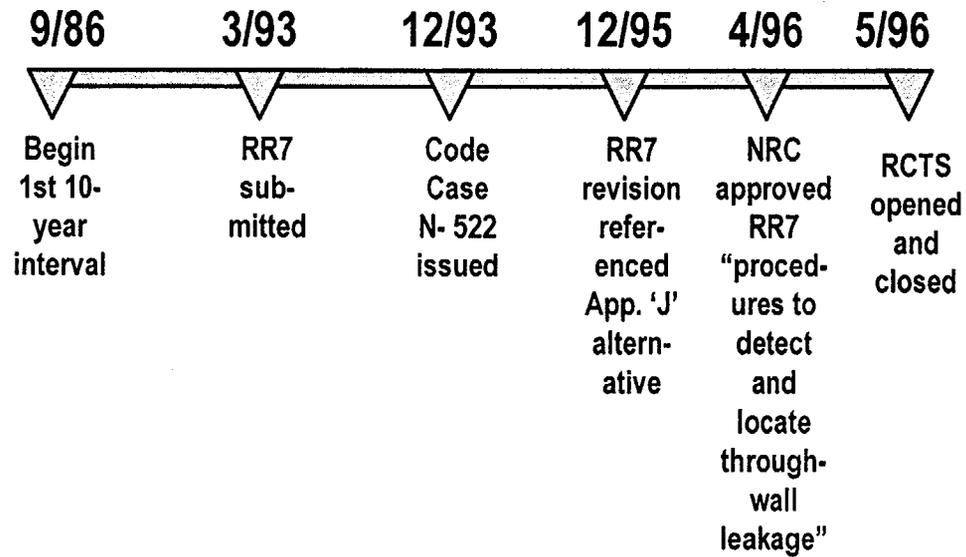
Alternative Examination Requested

- 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

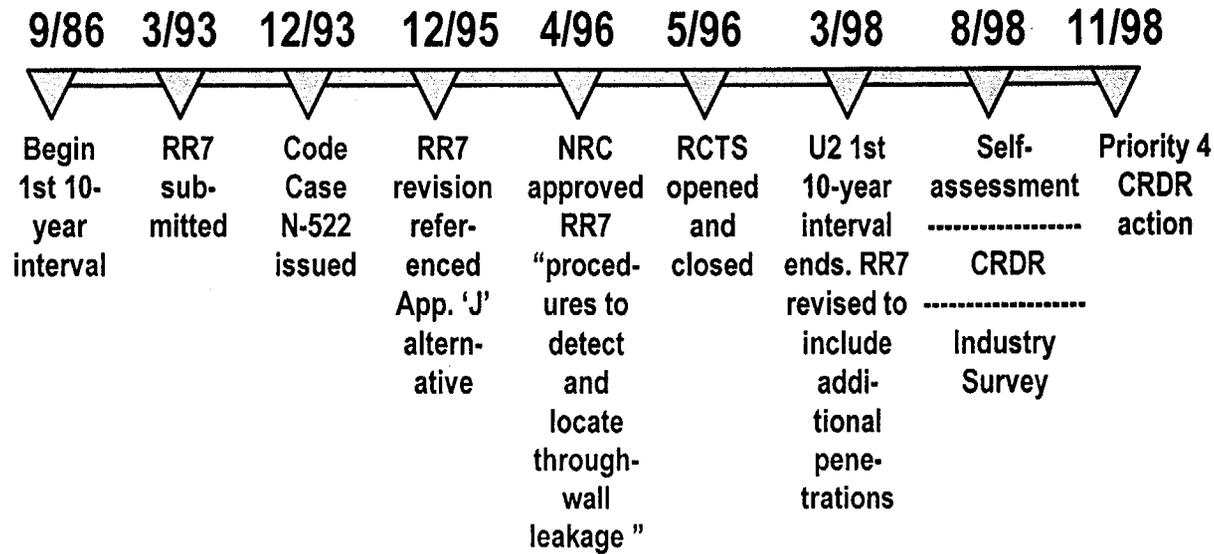


APS Implementation

- 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



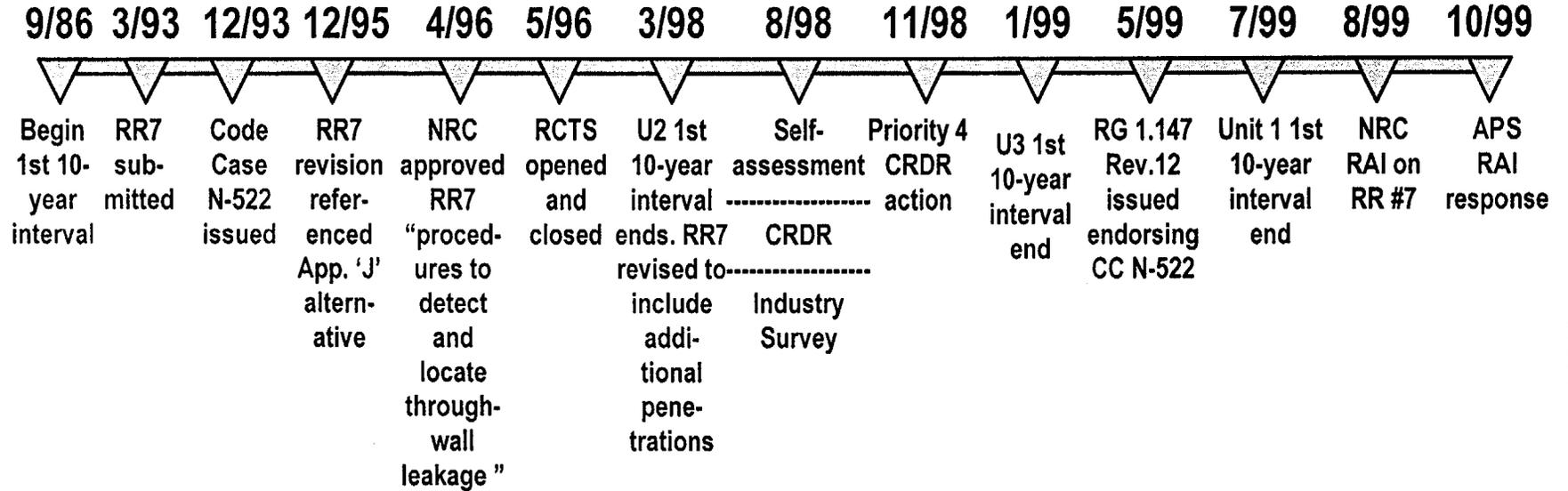
Industry Survey

- 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



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