



10CFR50.55a

Palo Verde Nuclear  
Generating Station

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102-04419-CDM/SAB/RKB

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U.S. Nuclear Regulatory Commission  
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Washington, DC 20555-0001

Dear Sirs:

- Reference:
1. APS Letter No. 102-04095-WEI/AKK/MLG, dated March 17, 1998, from W. E. Ide, APS, to NRC, "Inservice Inspection Programs for Second 10-Year Interval"
  2. APS Letter No. 102-04359-CDM/SAB/RKB, dated October 12, 1999, from C. D. Mauldin, APS, to NRC, "Response to PVNGS Units 1, 2 and 3 Second 10-Year Interval Inservice Inspection Programs – Request for Additional Information (RAI)"
  3. APS Letter No. 102-04096-WEI/AKK/MLG, dated March 17, 1998, from W. E. Ide, APS, to NRC, "Unit 2 First 10-Year Inservice Inspection Program Revision"
  4. APS Letter No. 102-04354-CDM/SAB/RKB, dated October 6, 1999, from C. D. Mauldin, APS, to NRC, "Response to Unit 2 First 10-Year Interval Inservice Inspection Program – Request for Additional Information (RAI)"
  5. APS Letter No. 102-04232-WEI/AKK/MLG, dated January 11, 1999, from W. E. Ide, APS, to NRC, "Unit 3 First Ten Year Inservice Inspection Revision"
  6. APS Letter No. 102-04312-WEI/SAB/RKB, dated July 16, 1999, from W.E. Ide, APS, to NRC, "Unit 1 First 10-Year Interval Inservice Inspection (ISI) Program – Revision 2"

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2 and 3  
Docket No. STN 50-528/529/530  
PVNGS Inservice Inspection (ISI) Programs for First and Second 10-  
Year Interval – Supplement to Request for Relief for End of Interval  
Testing of Class 1 Vent and Drain Lines**

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Clarification of First and Second Interval ISI Vent and Drain Line Relief

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In reference 1 above, Arizona Public Service Company (APS) submitted the PVNGS Units 1, 2 and 3 second 10-year interval ISI programs. The second interval programs were accompanied by several requests for relief.

In reference 2 above, APS provided a response to the NRC Staff's request for additional information regarding several of the second 10-year interval relief requests. Per telephone conversations held between APS and the NRC on March 15 and 16, 2000, this letter is being provided as clarification of APS' response in reference 2 regarding the second 10-year interval Relief Request No. 9. The information presented herein is also applicable to Unit 1 Relief Request No. 14 (reference 6), Unit 2 Relief Request No. 12 (references 3 and 4) and Unit 3 Relief Request No. 12 (reference 5) for the first 10-year interval ISI programs.

In Relief Request No. 9 APS is requesting relief from the ASME Code, Section XI IWB-2500 and IWB-5200 end of interval requirement to pressurize the small portion of pipe beyond the first isolation valve on several vent and drain lines prior to performing a visual examination. In APS' response to the request for additional information regarding Relief Request No. 9, APS stated that the size of the lines in question were all one inch or less nominal pipe size (NPS). An APS ISI Engineer reviewing the relief request identified that the following five lines for which relief is requested are two-inch NPS:

<b>System:</b>	<b>Line No.:</b>	<b>P&amp;ID No.:</b>	<b>Valve Description:</b>
RC	RC089	RCP001	XPRCEV332
RC	RC096	RCP001	XPRCEV333
RC	RC058	RCP001	XPRCEV335
RC	RC070	RCP001	XPRCEV215
RC	RC060	RCP001	XPRCEV334

In addition to providing clarification on the existence of two-inch vent and drain lines in the relief request, the NRC requested that APS also clarify the statement made in the relief request that several valves in the subject vent and drain lines may be manipulated while in Mode 5 to prevent reactor coolant pump (RCP) seal damage. The valves that are operated at the low system pressures associated with Mode 5, prior to starting the first RCP, are as follows:

<b>System:</b>	<b>Line No.:</b>	<b>P&amp;ID No.:</b>	<b>Valve Description:</b>
RC	RC112	RCP002	XPRCNV869
RC	RC106	RCP002	XPRCNV868
RC	RC118	RCP002	XPRCNV871
RC	RC124	RCP002	XPRCNV870

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These valves are manipulated for the flushing of the cyclone filters at the RCPs in accordance with PVNGS operating procedure 40OP-9RC01, "Reactor Coolant Pump Operation." The flushing is performed to remove debris from the filters to prevent unnecessary wear to the RCP seals. This procedure specifies that these valves can only be manipulated with the plant in Mode 5 with reactor coolant system (RCS) pressure less than 300 psia and RCS temperature less than 200 degrees Fahrenheit. This procedure specifies that the cyclone filter flushing evolution should last approximately 2-3 minutes, that the valves are closed, and that an independent verification be performed and documented to ensure valve manipulation was performed correctly.

In summary, this letter provides clarification regarding the presence of several two-inch lines in the subject relief requests stated above, for which APS is requesting relief from the end of interval requirement to pressurize these lines prior to performing the visual examination. In addition, clarification has been provided regarding valves which are manipulated for the purpose of flushing RCP seal filters in Mode 5.

**Precedent**

The NRC has approved a similar request for relief in a letter dated October 15, 1998, from W. H. Bateman, NRC, to G. M. Rueger, Pacific Gas and Electric Company, Nuclear Power Generation, "Evaluation of Second 10-Year Interval Inservice Inspection Program Plan and Associated Requests for Relief for Diablo Canyon Power Plant, Units 1 and 2 (TAC Nos. M95068 and M95069)."

No commitments are being made to the NRC by this letter.

Should you have any questions, please contact Scott A. Bauer at (623) 393-5978.

Sincerely,



CDM/SAB/RKB/rkb

cc: E. W. Merschoff  
M. B. Fields  
J. H. Moorman