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U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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Washington, DC 20555

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, & 3  
Docket Nos. STN 50-528/529/530  
Periodic Report of Commitment Changes**

The enclosure to this submittal contains Arizona Public Service Company's (APS) Periodic Report of Commitment Changes. This submittal has been prepared in accordance with guidance similar to the Nuclear Energy Institute's *Guidelines for Managing NRC Commitment Changes*, Revision 0, July 1999.<sup>1</sup> APS is submitting this information to identify changes to commitments made by APS which require NRC notification. This report is a compilation of those commitment changes requiring NRC notification which were completed between October 8, 1999 and October 2000.

The enclosure identifies the original commitments, the source documents in which the commitments were made, the changes made to the original commitments and a brief justification for each action. APS uses a commitment action tracking system to manage and track regulatory commitments and complete documentation supporting each of the commitment changes is available for NRC review at PVNGS.

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

Questions regarding this submittal should be directed to Russell A. Stroud, Regulatory Affairs at (623) 393-6492.

Sincerely,

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<sup>1</sup> NRC endorsement of NEI 99-04 is documented in Regulatory Issue Summary 2000-17, September 21, 2000.

**ENCLOSURE**

**PVNGS Units 1, 2, & 3  
Docket Nos. STN 50-528/529/530  
PERIODIC REPORT OF COMMITMENT CHANGES**

**PVNGS Units 1, 2, & 3**  
**Docket Nos. STN 50-528/529/530**  
**Periodic Report of Commitment Changes**

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**COMMITMENT CHANGE A**

**Commitment Source Document(s):**

APS letter no. ANPP-35939/EEVB/KLM/98.05, dated April 3, 1986, from E. E. Van Brunt (APS) to G. W. Knighton (Director, Nuclear Reactor Regulation, USNRC). This commitment was made in response to Generic letter 83-28, *Required Actions Based on Generic Implications of Salem ATWS Events*.

*The commitment was specifically made to address issues relating to Item 4.2.1, 12, Functional test of the breaker prior to returning it to service: "The applicant is to confirm that the periodic maintenance program includes these 12 items at the specified interval or commit to their inclusion."*

**Original Commitment:**

"ANPP confirms that the reactor trip breaker periodic maintenance (PM) program, which is performed at six month intervals, includes all the twelve items of concern, with the following exception. Verification of proper trip response is not conducted."

**Commitment Change:**

The performance cycle for the reactor trip breaker periodic maintenance has been extended to an 18 month interval, with an allowable maximum extension of 1.25 times the stated frequency.

**Commitment Change Justification:**

At the time APS committed to perform reactor trip breaker periodic maintenance on six month intervals, General Electric Model AKR-30 and Westinghouse Model DS-206 circuit breakers were being used as reactor trip switchgear (RTSG) breakers. In 1994, APS installed Westinghouse Model DS-416 RTSG breakers to improve reliability and to resolve inherent deficiencies associated with General Electric Model AKR-30 and Westinghouse Model DS-206 circuit breakers. Since their installation, maintenance and operating records have shown that the DS-416 RTSG breakers have had no significant failures.

Secondly, the Westinghouse maintenance program manual states the maintenance interval for DS-416 breakers used as Category A breakers (class 1E) should be performed every 500 cycles or during refueling outages, which ever comes first, with no maintenance exceeding 24 months. On a 6-month preventive maintenance schedule, the RTSG breakers are cycled approximately 50 times. Changing the preventive maintenance performance cycle to 18 months will significantly reduce the number of cycles the RTSG breakers will experience and is consistent with industry practice for Westinghouse DS-16 breakers.

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Changing the preventive maintenance frequency from 6 to 18 months will not negatively impact the ability of the RTSG breakers to perform their safety function or negatively impact the APS' ability to ensure the component is capable of performing its intended safety function.

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**COMMITMENT CHANGE B**

**Commitment Source Document(s):**

APS letter no. ANPP-35355-EEVB/JBK/98.05, dated February 28, 1986, from E. E. Van Brunt, Jr. (APS), to J. B. Martin (Regional Administrator, Region V, USNRC). Subject: NRC IE Bulletin 85-01, *Binding of Auxiliary Feedwater Pumps*.

*The commitment was made to specifically address NRC Action Item 1: "Develop procedures for monitoring fluid conditions within the AFW system on a regular basis during times when the system is required to be operable..."*

**Original Commitment:**

"Procedures 41OP-1AF02 (1-31-86), 41OP-2AF02 (2-7-86) and 41OP-3AF02 (2-7-86) are revised to include fluid temperature monitoring (using temperature plate recording tape) at least once per shift at the non-safety related AFW pump discharge in all three units."

**Commitment Change:**

This commitment is no longer being maintained as an active commitment in the PVNGS commitment action tracking system.

**Commitment Change Justification:**

The action to develop procedures for fluid temperature monitoring is being maintained as a separate commitment action made in response to NRC Generic Letter 88-03 RESOLUTION OF GENERIC SAFETY ISSUE 93, "STEAM BINDING OF AUXILIARY FEEDWATER PUMPS" (GENERIC LETTER 88-03).

This change is being made to eliminate a duplication of like commitments and to consolidate the commitment action tracking database.

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**COMMITMENT CHANGE C**

**Commitment Source Document(s):**

APS letter no. ANPP-35355-EEVB/GBK/98.05, dated February 28, 1986, from E. E. Van Brunt, Jr. (APS), to J. B. Martin (Regional Administrator, Region V, USNRC). Subject: NRC IE Bulletin 85-01, *Binding of Auxiliary Feedwater Pumps*.

*The commitment was made to specifically address NRC Action Item 2: Develop procedures for recognizing steam binding and for restoring the AFW system to an operable status, should steam binding occur.*

**Original Commitment:**

"Procedures 41OP-1AF02, 41OP-2AF02 and 41OP-3AF02 are revised to include the identification of steam binding from increasing pipe temperature due to possible leakage."

**Commitment Change:**

This commitment is no longer being maintained as an active commitment in the PVNGS commitment action tracking system.

**Commitment Change Justification:**

The action to develop procedures for recognizing steam binding and for restoring the AFW system to an operable status is being maintained as a separate commitment action made in response to NRC Generic Letter 88-03 RESOLUTION OF GENERIC SAFETY ISSUE 93, "STEAM BINDING OF AUXILIARY FEEDWATER PUMPS" (GENERIC LETTER 88-03).

This change is being made to correct a duplication of like commitments and consolidate actions with the PVNGS commitment action tracking database.

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**COMMITMENT CHANGE D**

**Commitment Source Document(s):**

APS letter no. ANPP-35355-EEVB/GBK/98.05, dated February 28, 1986, from E. E. Van Brunt, Jr. (APS), to J. B. Martin (Regional Administrator, Region V, USNRC). Subject: NRC IE Bulletin 85-01, *Binding of Auxiliary Feedwater Pumps*.

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*The commitment was made to specifically address NRC Action Item 1: "Develop procedures for monitoring fluid conditions within the AFW system on a regular basis during times when the system is required to be operable..."*

**Original Commitment:**

"Procedures 41OP-1AF02 (1-31-86), 41OP-2AF02 (2-7-86) and 41OP-3AF02 (2-7-86) are revised to include fluid temperature monitoring (using temperature plate recording tape) [emphasis added] at least once per shift at the non-safety related AFW pump discharge in all three units."

**Commitment Change:**

This commitment is no longer being maintained as an active commitment in the PVNGS commitment action tracking system.

**Commitment Change Justification:**

The action to install temperature plate recording tape on the non-safety related AFW pump discharges in all three units was a one-time action that had been completed by January 31, 1986.

This change is being made to correct an errant database flag in the PVNGS commitment action tracking system that indicated this commitment was still active.

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**COMMITMENT CHANGE E**

**Commitment Source Document(s):**

APS letter no. 102-03583-WLS/AKK/ACR, dated January 11, 1996, from William L. Stewart (Executive Vice President, Nuclear, APS) to L. J. Callan (Regional Administrator, Region IV, USNRC). Subject: Response to an Apparent Violation.

This commitment was made to specifically address one of the corrective steps being taken by APS to avoid further [10CFR50.7] violations.

**Original Commitment:**

"...We have committed to the NRC to have our Nuclear Assurance Department conduct a yearly audit of the Integrated Issues Resolution Process, and we will make any necessary refinements."

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**Commitment Change:**

This commitment is no longer being maintained in the PVNGS commitment action tracking system. Although APS will continue to perform the activity of auditing the Integrated Issues Resolution Process, the periodicity of the audits and/or self-assessments used to gage effectiveness is no longer be based upon the commitments set forth in the response to the apparent violation. Rather, this action is being taken as deemed necessary to assure program effectiveness.

**Commitment Change Justification:**

APS made this commitment in response to an apparent violation of 10CFR50.7, *Employee Protection*. APS stated in the response to the apparent violation that the implementation of the Integrated Issues Resolution Process had been successful in encouraging employees to bring concerns to front-line supervision or formally through site issue resolution processes and the corrective action program. Beyond that, APS committed to take the aforementioned actions so as not to become complacent when dealing with employee issues and to ensure continued success and improvement of the IIR process.

The programmatic and culture changes implemented by APS in the early 1990s were successful in improving the safety-conscious work environment at Palo Verde, as evidenced by the steady improvement in the number and disposition of employee concerns. Therefore, the maintenance of this commitment is no longer necessary.

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**COMMITMENT CHANGE F**

**Commitment Source Document(s):**

APS letter no. 102-03583-WLS/AKK/ACR, dated January 11, 1996, from William L. Stewart (Executive Vice President, Nuclear, APS) to L. J. Callan (Regional Administrator, Region IV, USNRC). Subject: Response to an Apparent Violation.

This commitment was made to specifically address one of the corrective steps being taken by APS to avoid further [10CFR50.7] violations.

**Original Commitment:**

"...We have committed to the NRC to have our Nuclear Assurance Department conduct a yearly audit of the Integrated Issues Resolution Process, and we will make any necessary refinements. We have also developed an internal Integrated Issues Resolution Process Self-Assessment. The purpose of the self-assessment is to measure the effectiveness of the

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Integrated Issues Resolution Process. The self- assessment will be conducted by interviewing a random sample of employees who had issues addressed through the Integrated Issues Resolution Process. The results will be reported to Palo Verde management on a quarterly basis.”

**Commitment Change:**

This commitment is no longer being maintained in the PVNGS commitment action tracking system. Although APS will continue to perform the activity of self-assessing the Integrated Issues Resolution Process to gage the effectiveness, the periodicity for performing the self-assessments are no longer based upon the commitments set forth in the response to the apparent violation. Rather, this action is being taken as deemed necessary to assure program effectiveness.

**Commitment Change Justification:**

APS made this commitment in response to an apparent violation of 10CFR50.7, *Employee Protection*. APS stated in the response to the apparent violation that the implementation of the Integrated Issues Resolution Process had been successful in encouraging employees to bring concerns to front-line supervision or formally through site issue resolution processes and the corrective action program. Beyond that, APS committed to take the aforementioned actions so as not to become complacent when dealing with employee issues and to ensure continued success and improvement of the IIR process.

The programmatic and culture changes implemented by APS in the early 1990s were successful in improving the safety-conscious work environment at Palo Verde, as evidenced by the steady improvement in the number and disposition of employee concerns. Therefore, the maintenance of this commitment is no longer necessary.