



Scott A. Bauer
Department Leader
Regulatory Affairs
Palo Verde Nuclear
Generating Station

Tel: 623/393-5978
Fax: 623/393-5442
e-mail: sbauer@apsc.com

Mail Station 7636
P.O. Box 52034
Phoenix, AZ 85072-2034

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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-37
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 1999.¹ 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 November 2000 and February 2002.

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.

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

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Periodic Report of Commitment Changes
Page 2

Questions regarding this submittal should be directed to Daniel G. Marks, Section Leader,
Regulatory Affairs at (623) 393-6492.

Sincerely,

TN WABOR for
SA Bauer

SAB/RAS/ras

Enclosure

cc: E. W. Merschoff (all with enclosure)
J. H. Moorman
J. N. Donohew

ENCLOSURE

PVNGS Units: 1, 2, & 3

Docket Nos: 50-528/529/530

PERIODIC REPORT OF COMMITMENT CHANGES

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*.

Original Commitment:

The commitment was specifically made in response to Information Requested for Item 4.2.2 of the above referenced letter. Specifically, stated:

The PVNGS procedure, "Six Month Maintenance of Reactor Trip Breakers," requires that the following parameters be measured, recorded and trended for the purpose of forecasting degradation of operability:

Undervoltage trip attachment dropout voltage;

Trip torque;

Breaker insulation resistance.

Commitment Change:

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

Commitment Change Justification:

At the time APS committed to measure and trend undervoltage trip attachment dropout voltage, trip torque and breaker insulation resistance, 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. Therefore, this commitment is no longer applicable.

COMMITMENT CHANGE B

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*.

Original Commitment:

"ANPP confirms that the reactor trip breaker periodic maintenance program, which is performed at six month intervals, includes all of the above twelve items of concern, with the following exception:

Breaker response time for ..."

Commitment Change:

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

Commitment Change Justification:

At the time APS committed to perform the reactor trip breaker periodic maintenance program and associated activities, 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. Therefore, this commitment is no longer applicable.

COMMITMENT CHANGE C

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 made to specifically address NRC Information Request for Item 4.1 of the above referenced letter. Specifically, the NRC wrote: "The applicant should address his position with regard to the ball bearing change as recommended by General Electric Service Advice 9.20, Dated March 21, 1984."

Original Commitment:

Further, Maintenance Procedure "Six Month Maintenance of Reactor Trip Circuit Breakers" was revised to ensure that "If trip torque... was unsatisfactory (in excess of 1.5 inch pounds) trip shaft bearings shall be replaced."

Commitment Change:

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

Commitment Change Justification:

At the time APS committed to revise the maintenance procedure ("*Six Month Maintenance of Reactor Trip Circuit Breakers*") 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. Therefore, this commitment is no longer applicable.

COMMITMENT CHANGE D

Commitment Source Document(s):

APS letter no. 102-02302-WFC/JNI, dated October 2, 1992, from W. F. Conway (APS), to USNRC Document Control Desk. Subject: **Response to NRC Request for Additional Information Related to Generic Letter 87-09 Technical Specification Amendment Request.**

Original Commitment:

"APS will revise Operating Procedures to require appropriate management approval prior to operating mode changes while in a Technical Specification Limiting Condition for Operation as allowed in the proposed Technical Specification 3.0.4 changes. This will limit the reliance on Technical Specification 3.0.4 for plant startups to those situations that are necessary and safe for plant operations."

Commitment Change:

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

Commitment Change Justification:

This commitment is no longer needed due to the issuance of Amendment 117 to the PVNGS Operating License. This license amendment implemented the Improved Technical Specifications, which were based upon the guidance described in NUREG-1432.

COMMITMENT CHANGE E

Commitment Source Document(s):

Letter no. ANPP-19200, dated October 20, 1981 - NUREG-0612, Section 2.3 SPECIFIC REQUIREMENT FOR OVERHEAD SYSTEM OPERATION IN THE CONTAINMENT

Original Commitment:

NUREG 0612 Response to Section 2.3-4-a (from page 8)

To prevent loads from being carried over the open Reactor Vessel, the Polar Crane will be equipped with an interlock to prevent the trolley from moving within 15 feet of the Reactor Vessel. This interlock can be bypassed for removal and replacement of the Upper Guide Structure and Reactor Vessel Head and loads located in the area above the Head.

The only heavy load to be carried through this interlock after the head is removed and when fuel is present is the Upper Guide Structure. After the UGS is removed, the RV area interlock will not be bypassed until it is replaced. The movements of the UGS and the Head are evaluated in C-E's report, "Evaluation of RV Head Drop for the CE System 80 CESSAR NSSS" (submitted to the NRC October 8, 1981 as C-E letter LD-81-069).

Commitment Change:

This commitment was not adhered to during the Unit 2 CEA replacement during October 2001. Specifically, the Polar Crane trolley was allowed to enter into the 15' reactor vessel exclusion zone at two specific locations. The first location allowed the Polar Crane access to the UGS lift rig at the UGS storage pit. The second location provided for access to the UGS lift rig storage site at the Core Support Barrel storage stand. This process was reversed to allow for retrieval and reinstallation the UGS lift rig following removal and replacement of the CEAs.

Commitment Change Justification:

The Containment Building Polar Crane, 13MZCNG01, is equipped with interlocks which prevent loads from being carried directly over the open reactor vessel. For the Unit-2 Control Element Assembly (CEA) Short Notice Outage (SNO), an alternate path was required for the Upper Guide Structure Lift Rig (UGSLR).

This required partial entry into the 15-Foot Exclusion Zone (around the edge of the Reactor Vessel) by the polar crane trolley, the polar crane auxiliary hook and the main hook. The polar crane auxiliary 35-Ton (small) hook carried the load (the UGSLR). The polar crane main 225-Ton (large) hook was empty.

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

The proposed action did not involve the movement of any loads over fuel in the open Reactor Vessel (RV). During this evolution, the Polar Crane Main Hook was removed from service in accordance with the Station Manual Permit and Tagging Process, (Procedure 40DP-90P29). In addition, the Polar Crane trolley and Main Hook are designed to retain structural integrity during and after a Safe Shutdown Earthquake (SSE). As such, these components are precluded for all analyzed seismic conditions from becoming dislodged and damaging fuel in the open Reactor Vessel. Movement of these components within the 15-foot exclusion zone did not result in damage to irradiated fuel within the open Reactor Vessel.

An alternate load path was required for the UGSLR that did not traverse the fuel in the open Reactor Vessel. To accomplish this, the UGSLR was removed from the UGS and stored in the Core Support Barrel (CSB) storage stand using an approved Safe Load Path. For this Safe Load Path, the lift rig was removed from the UGS storage pit location and transported to the 168-foot Containment elevation between the stored RV Head and Steam Generator No. 1. The lift rig was moved to the North around the SG roughly parallel with the Refueling Cavity. The lift rig was then aligned with and placed in its designated storage location at the CSB storage stand.

Based on the configuration of the Safe Load Path selected, the potential for the UGSLR to impact irradiated fuel in the Reactor Vessel was minimized. The configuration of the UGS storage pit and CSB storage stand are such that a drop of the UGSLR at these locations would not result in an impact to fuel in the open Reactor Vessel. The center of gravity of the UGSLR was maintained at a sufficient distance from the RV based on the physical layout of the Refueling Cavity. The distances are such that a load drop of the UGSLR at these locations precluded an impact to irradiated fuel in the open RV. In addition, the Safe Load Path selected did not permit a load drop, which could disable both trains of the Shutdown Cooling System.
