



Palo Verde Nuclear
Generating Station

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102-05039-CDM/SAB/GAM
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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528, 50-529, and 50-530
Supplement to Response to NRC Bulletin 2003-01,
"Potential Impact of Debris Blockage on Emergency Sump
Recirculation at Pressurized Water Reactors"**

In a letter dated August 8, 2003 (letter no. 102-04983), Arizona Public Service Company (APS) submitted to the NRC the response to NRC Bulletin 2003-01, "Potential Impact of Debris Blockage on Emergency Sump Recirculation at Pressurized Water Reactors," for the Palo Verde Nuclear Generating Station (PVNGS), Units 1, 2, and 3. Since it is understood that Bulletin 2003-01 responses are still under review by the NRC, APS is submitting this letter to provide supplemental information related to APS' Bulletin 2003-01 response due to results of recent PVNGS containment sump inspections.

In the August 8, 2003 Bulletin 2003-01 response letter, APS stated that detailed inspections had been conducted in all three PVNGS units in response to NRC Information Notice 89-77, Supplement 1, and industry operating experiences, and that these inspections verified that no gaps existed between structural members and the fine screen that would permit passage of debris larger than the screen mesh size. The response also states that all penetrations into the sump were adequately equipped with collar devices or other barriers to ensure that no gaps existed that would permit larger debris to pass into the sump.

On December 2, 2003, after the Bulletin 2003-01 response was submitted, APS performed routine outage inspections of the containment sump screens in Unit 2. During these inspections, a one-inch diameter hole was discovered in the top cover plate in each of the two containment sump screen structures. The one-inch holes (one in each sump cover pate) were larger than the screen mesh size of 0.09". The holes were plugged and subsequent sump inspections were conducted in Units 1 and 3. No holes were found in the sump cover plates in Units 1 and 3, and the current containment sump configuration in all three units corresponds to their design.

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Although the 1" holes in the Unit 2 containment sump cover plates were larger than the sump screen mesh size of 0.09", an engineering assessment has concluded that, due to the location of the holes in the top sump screen structure cover plates, transport of debris through the holes and into the ECCS and CS systems in event of a loss of coolant accident (LOCA) would have been unlikely. It has been determined that the holes resulted from the relocation of a sump fluid temperature detector conduit by a design change package implemented during initial Unit 2 plant construction in 1985. The holes were apparently missed during previous containment sump inspections since these inspections concentrated on sump screen configuration and the annular gaps for existing conduits and piping.

This condition has been entered into the PVNGS corrective action program, and it has been concluded that this condition was not reportable under any reportability requirements. This condition was also discussed at the NRC Resident Inspector exit meeting at PVNGS on January 7, 2004, where the NRC Inspector discussed this condition as a proposed green non-cited violation for failure to maintain design control. This proposed violation is expected it to be included in PVNGS Inspection Report 50-528/03-05; 50-529/03-05; 50-530/03-05.

No commitments are being made to the NRC by this letter. Should you have any questions, please contact Thomas N. Weber at (623) 393-5764.

Sincerely,



CDM/SAB/GAM

cc:	B. S. Mallett	NRC Region IV Regional Administrator
	M. B. Fields	NRC NRR Project Manager
	N. L. Salgado	NRC Senior Resident Inspector for PVNGS