June 2, 2009

MEMORANDUM TO: Michael T. Markley, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: James R. Hall, Senior Project Manager ***/RA/***
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE MAY 22, 2009, CONFERENCE CALL WITH ARIZONA PUBLIC SERVICE COMPANY REGARDING RELIEF REQUEST NO. PRR-8 FOR PALO VERDE NUCLEAR GENERATING STATION, UNIT 3 (TAC NO. ME1346)

By letter dated May 22, 2009 (Enclosure 1; Agencywide Documents Access Management System (ADAMS) Accession No. ML091460739), Arizona Public Service Company (APS), the licensee for Palo Verde Nuclear Generating Station (PVNGS), Unit 3, submitted Relief Request No. PRR-08 for approval of an alternative to certain pump testing requirements of the American Society of Mechanical Engineers (ASME) *Code for Operation and Maintenance of Nuclear Power Plants*, 2001 Edition with 2003 Addenda (the Code), under the provisions of Title 10 of the *Code of Federal Regulations* 50.55a(a)(3)(ii). Specifically, the licensee requested approval from the U.S. Nuclear Regulatory Commission (NRC) to permit the use of an alternative to the Code-required post-maintenance full flow test to demonstrate the operational readiness of the B train high pressure safety injection (HPSI) pump. The alternative testing would apply to PVNGS Unit 3 until the next refueling outage, when the next comprehensive, full flow test of the pump is conducted.

Two conference calls were held on May 22, 2009, between NRC and APS staff to discuss the relief request. In the first call, APS provided discussion slides (Enclosure 2, ADAMS Accession No. ML091460763) and described the recent test and maintenance history on Unit 3 HPSI pump B, the alternative testing to be performed, and the basis for the requested relief. APS requested verbal approval of PRR-08 from NRC by May 22, 2009, in order to support the restart of the Unit 3 reactor from the current refueling outage. The NRC staff noted that NRC procedures allow the staff, in limited instances, to grant verbal authorizations for alternatives under 10 CFR 50.55a(a)(3) when justified, and when, due to unforeseen circumstances, licensees need NRC authorization before the staff is able to issue its safety evaluation (SE). The staff informed APS that this process requires the formal submittal of the relief request in writing, as described in LIC-102, Revision 1, “Relief Request Reviews,” dated January 26, 2005 (ADAMS Accession No. ML042780148).

Later on May 22, 2009, APS submitted the formal relief request, which was prompted by the identification of leakage from the Unit 3 HPSI pump B outboard seal on May 20, 2009. The outboard mechanical seal and bearing were replaced, with the unit in Mode 5 preparing to restart from refueling outage 14. In its letter, APS explained that Code requirement ISTB-3310, *Effect of Pump Replacement, Repair, and Maintenance on Reference Values,* applies in this case, due to the maintenance and replacement of the HPSI pump outboard mechanical seal and bearing. As such, the Code requires that a new reference vibration value or set of values be determined or the previous vibration value(s) reconfirmed by a comprehensive test run before declaring the affected pump operable. The restoration of HPSI pump B operability is necessary for Unit 3 to resume power operation.

The licensee's proposed alternative involves running the affected HPSI train in a maximum recirculation mode to the Refueling Water Tank, which results in a test at roughly 70-80 percent of full flow (at least 750 gallons per minute (gpm) vs. 1040 gpm). The flowmeter used during the test will be accurate to within ± 5 percent vs. ± 2 percent required by the Code. Vibration data will be collected and analyzed to ensure that pump performance is acceptable and that the data is consistent with expected values when extrapolated to the comprehensive pump test reference values obtained at full flow. In addition, vibration data will be collected and analyzed during the quarterly Group B surveillance tests throughout the operating cycle to provide continued assurance of acceptable pump performance.

Following receipt of the licensee's formal relief request, the NRC and APS held a second conference call on May 22, 2009. A list of the participants in the conference calls is provided in Enclosure 3. In the second call, NRC staff from the Component Performance and Testing Branch in the Office of Nuclear Reactor Regulation stated that they had performed a technical review of PRR-08. Due to the need for prompt approval of the request, the staff did not have sufficient time to complete a written safety evaluation; therefore, the staff considered this relief request as a candidate for a verbal authorization in accordance with LIC-102. The NRC staff found that the analysis submitted by APS in support of PRR-08 was sufficient to provide reasonable assurance of the operational readiness of HPSI pump B for Unit 3. Furthermore, the licensee demonstrated that conducting the comprehensive full flow test for the HPSI pump in the current plant configuration would present a significant hardship without a compensating increase in the level of quality and safety, due to the potential increase in risk associated with the need to implement a temporary procedure change to conduct the required testing under a unique plant systems alignment. Therefore, pursuant to 10 CFR 50.55a(a)(3)(ii), the NRC staff verbally authorized the implementation of the proposed alternative of Relief Request No. PRR-08 at PVNGS Unit 3, which applies from the present refueling outage 14 through the duration of operating cycle 15 for Unit 3.

Based on the discussions with the NRC staff, APS committed to supplement the relief request with additional clarifying information in a letter to be submitted by May 29, 2009. The NRC staff plans to issue a written SE documenting the basis for its verbal authorization allowing APS to use the alternative proposed in PRR-08.

Docket No.: STN 50-530

Enclosures:
1. Relief Request PRR-08
2. APS Discussion Slides
3. List of Participants

Based on the discussions with the NRC staff, APS committed to supplement the relief request with additional clarifying information in a letter to be submitted by May 29, 2009. The NRC staff plans to issue a written SE documenting the basis for its verbal authorization allowing APS to use the alternative proposed in PRR-08.

Docket No.: STN 50-530

Enclosures:
1. Relief Request PRR-08
2. APS Discussion Slides
3. List of Participants

DISTRIBUTION:
PUBLIC
LPLIV Reading
RidsAcrsAcnw_MailCTR Resource
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RidsNrrPMPaloVerde Resource
RidsOgcRp Resource
RidsRgn4MailCenter Resource
STingen, NRR/DCI/CPTB
FLyon, NRR/DORL/LPL4

ADAMS Accession Nos : PKG: ML091460692, Summary: ML091460722, Encl 1: ML091460739, Encl 2 : ML091460763

OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	NRR/DCI/CPTB/BC	NRR/LPL4/BC	NRR/LPL4/PM
NAME	JRHall	JBurkhardt	JMcHale	MMarkley	JRHall
DATE	5/29/09	5/29/09	5/29/09	06/1/09	6/02/09

OFFICIAL AGENCY RECORD

LIST OF PARTICIPANTS

MAY 22, 2009, CONFERENCE CALLS

REGARDING RELIEF REQUEST NO. PRR-08

PALO VERDE NUCLEAR GENERATING STATION, UNIT 3

ARIZONA PUBLIC SERVICE COMPANY

Dwight Mims - V.P. Regulatory Affairs & Plant Improvement
John Hesser - V.P. Engineering
Louis Cortopassi - Plant Manager
H. Grover Hettel - Operations Director
Jeff Summy - Director Plant Engineering
Scott Bauer, Director, Regulatory Affairs
Doug Steinsiek - Department Leader Plant Engineering
Tom Weber - Department Leader Regulatory Affairs
Dennis Swan - Operations Department Leader
Jim Taylor - Operations Department Leader
Russell Stroud - Section Leader Licensing
Daniel Marks - Compliance Section Leader
James Proctor - Compliance Section Leader
Shawn Comstock - Engineering
Brian Lindenlaub - Engineering

U.S. NUCLEAR REGULATORY COMMISSION

Steve Tingen, Acting Branch Chief, Component Performance and Testing Branch, NRR
C. Fred Lyon, Acting Branch Chief, Plant Licensing Branch IV, NRR/DORL
James R. Hall, Senior Project Manager, NRR/DORL
Don Allen, Senior Project Engineer, RIV
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Joe Bashore, Resident Inspector, RIV