

NRR-PMDAPEm Resource

From: Lingam, Siva
Sent: Wednesday, August 17, 2016 9:01 AM
To: Michael.Dilorenzo@aps.com; Thomas.N.Weber@aps.com
Cc: Pascarelli, Robert; Waters, Michael; Stattel, Richard; Mazumdar, Subinoy; Singh, Gursharan
Subject: Palo Verde Nuclear Generation Plant, Units 1, 2, and 3 - Official EICB RAIs for LAR Associated with Degraded and Loss of Voltage Relay Modifications (CAC Nos. MF7569, MF7570, and MF7571)

By letter dated April 1, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16096A337), as supplemented by letter dated July 21, 2016 (ADAMS Accession No. ML16203A381), Arizona Public Service Company (the licensee) submitted a license amendment request (LAR) for Palo Verde Nuclear Generating Station, Units 1, 2, and 3, requesting an approval to revise the Technical Specifications (TSs). The proposed LAR would revise TS requirements regarding the degraded and loss of voltage relays that are planned to be modified to be more aligned with designs generally implemented in the industry. Specifically, the licensing basis for degraded voltage protection will be changed from reliance on a TS initial condition that ensures adequate post-trip voltage support of accident mitigation equipment to crediting automatic actuation of the degraded and loss of voltage relays to ensure proper equipment performance. After specifically reviewing the Allowable Value changes proposed in Surveillance Requirement (SR). 3.3.7.4, the U.S. Nuclear Regulatory Commission (NRC) staff from Instrumentation and Controls Branch (EICB) had the draft requests for additional information (RAIs) that were transmitted to you by e-mail on July 28, 2016. Subsequently, at your request, we held a clarification conference call on August 10, 2016, discussing the draft RAIs. As a result of this conference call, we have revised these RAIs as noted below, which are now in alignment with the clarification call. During the conference call, we also agreed for an NRC audit related to, but not limited to, the first two RAIs. Please provide your responses to the following **official** RAIs within 30 days from the date of this e-mail. Your timely responses will allow the NRC staff to complete its review on schedule.

1. In Attachment 4, Technical Description of Modification of the Degraded and Loss of Voltage Relays, of the LAR the licensee referred to Calculation 13-EC-PB-0202, 4160 V Degraded Voltage Relay (DVR) and Loss of Voltage Relay (LoVR) Setpoint & Calibration, Revision 5. Figures 5-2 and 5-3 in Attachment 4, documents the final results of the Allowable Values derived in this calculation. These values correspond to the proposed Allowable Values in TS SR 3.3.7.4. Please provide or make Calculation 13-EC-PB-0202 available to the NRC staff for audit. The information in this calculation will be used to confirm the proposed Allowable Values in SR 3.3.7.4 conform to the criteria of Regulatory Guide 1.105, Rev. 3.
2. Sections 5.11.2 and 5.11.3 documents the Work Order History of ABB Type 27N Relays and Agastat ETR Timers. Please provide or make data used to calculate the uncertainty limits available to the NRC staff for audit.
3. In Calculation 13-EC-PB-0202, where the parameters have been obtained from the vendors, explain how data provided is used to ensure conformance to 95/95 confidence level specified in Regulatory Guide 1.105, Rev. 3.

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