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AUTHOR AFFILIATION AUTH.NAME

EISENHUT, D.G.

VAN BRUNT, E. E. Arizona Public Service. Co. RECIP. NAME: RECIPIENT AFFILIATION Division of Licensing

SUBJECT: Advises that util is producing natural circulation cooldown guideline for use in drafting procedures to satisfy concerns in NRC Genric Ltr 81-21.

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PUBLIC SERVICE COMPANY

P.O. BOX 21666

PHOENIX, ARIZONA 85036

August 28, 1981 ANPP-18797 - JMA/KWG

U.S. HUCIEAR REGULATORS

Mr. Darrell G. Eisenhut, Director Division of Licensing Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Subject:

Palo Verde Nuclear Generating Station

(PVNGS) Units 1, 2 and 3

Docket Nos. STN-50-528/529/530

File: 81-056-026; G.1.10

Reference:

Letter from D. G. Eisenhut, to All Licensees of, and Applicants for, PWR Operating Licenses, dated May 5, 1981, subject: Generic Letter #81-21 "Natural Circu-

lation Cooldown"

Dear Mr. Eisenhut:

Arizona Public Service Company (APS), as project manager and operating agent for PVNGS, and as a member of the CE Owner's Group, is sponsoring the production of a "Natural Circulation Cooldown Guideline" to be published by CE for use in drafting procedures that will satisfy the NRC concerns in Generic Letter 81-21. The report will be CENPSD-154 and it is expected to be available by August 31, 1981. Upon receipt of CENPSD-154, APS will draft a Natural Circulation Cooldown operating procedure with an estimated completion date of six months after receipt of CENPSD-154.

An analysis consistent with the recommendations of CENPSD-154, supplemented as necessary with data from startup testing accomplished per CESSAR 14.2.12.5.1 and the special low power testing required by NUREG-0737, Item I.G.1 as modified by R. L. Tedesco's letter of June 12, 1981 to E. E. Van Brunt, Jr., will be conducted to verify that controlled natural circulation cooldown from operating conditions to cold shutdown conditions, conducted according to the operating procedure, will not result in reactor vessel voiding.

Additionally, an analysis applying conservative initial conditions and instrument errors will be made to show that sufficient condensate-grade auxiliary feedwater is available to achieve cold shutdown using the operating procedure.

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Theory and procedures for natural circulation cooldown shall be included in the licensed operator training and retraining programs described in the PVNGS FSAR Sections 13.2.1.1.1 and 13.2.2.1. Instruction shall include:

- 1. Limitations on cooldown rates and their bases.
- Expected indications of natural circulation cooldown and indications (such as rapidly changing pressurizer level) which would indicate voiding.
- 3. Key points from natural circulation cooldown procedures.

If you have further questions, please contact me.

Very truly yours,

E. E. Van Brunt, Jr.

APS Vice President, Nuclear Projects

ANPP Project Director

EEVBJr/KWG/av

cc: J. Kerrigan

P. Hourihan

A. C. Gehr

