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 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Public 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Public 05000530

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 RECIP. NAME RECIPIENT AFFILIATION
 TEDESCO, R.L. Assistant Director for Licensing

SUBJECT: Forwards comments &/or inaccuracies found in Nov 1981 SER,
 NUREG-0857.

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NOTES: Standardized plant. 05000528
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April 16, 1982
ANPP-20721-WFQ/KWG

Mr. R. L. Tedesco
Assistant Director for Licensing
Division of Licensing
Office of the Nuclear Reactor Regulation
Washington, DC 20555



Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 & 3
Docket Nos. 50-528/529-530
File: 82-056-026/82-005-419.05

Reference: NUREG-0857 dated November, 1981, "Safety Evaluation
Report Related to the Operation of Palo Verde Nuclear
Generating Station, Units 1, 2 & 3

Dear Mr. Tedesco:

Please find attached a list of comments and/or inaccuracies found
in the referenced document.

If you have any questions, please contact me.

Very truly yours,

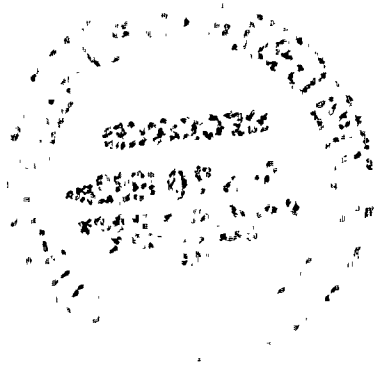
E. E. Van Brunt, Jr.
APS Vice President,
Nuclear Projects
ANPP Project Director

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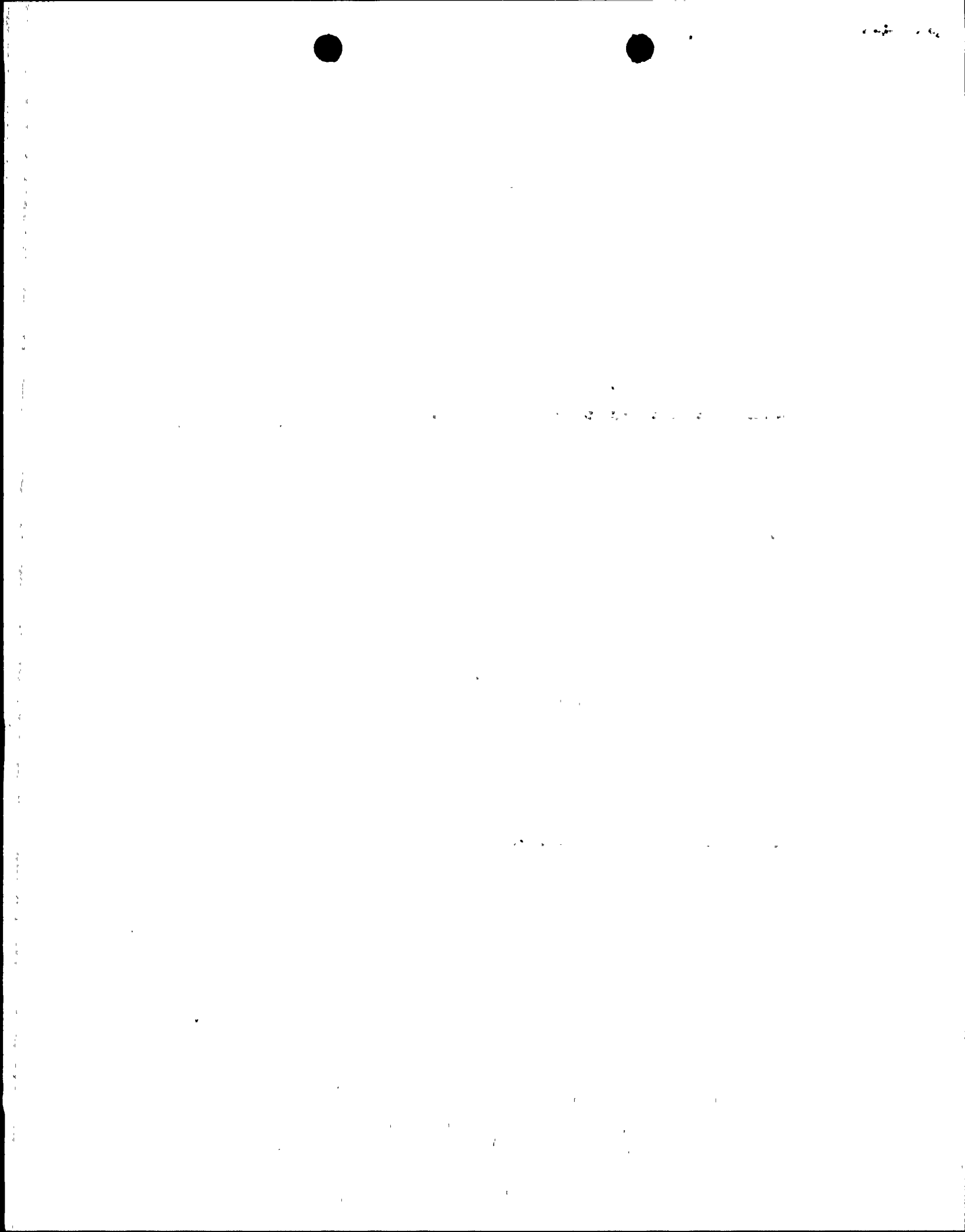
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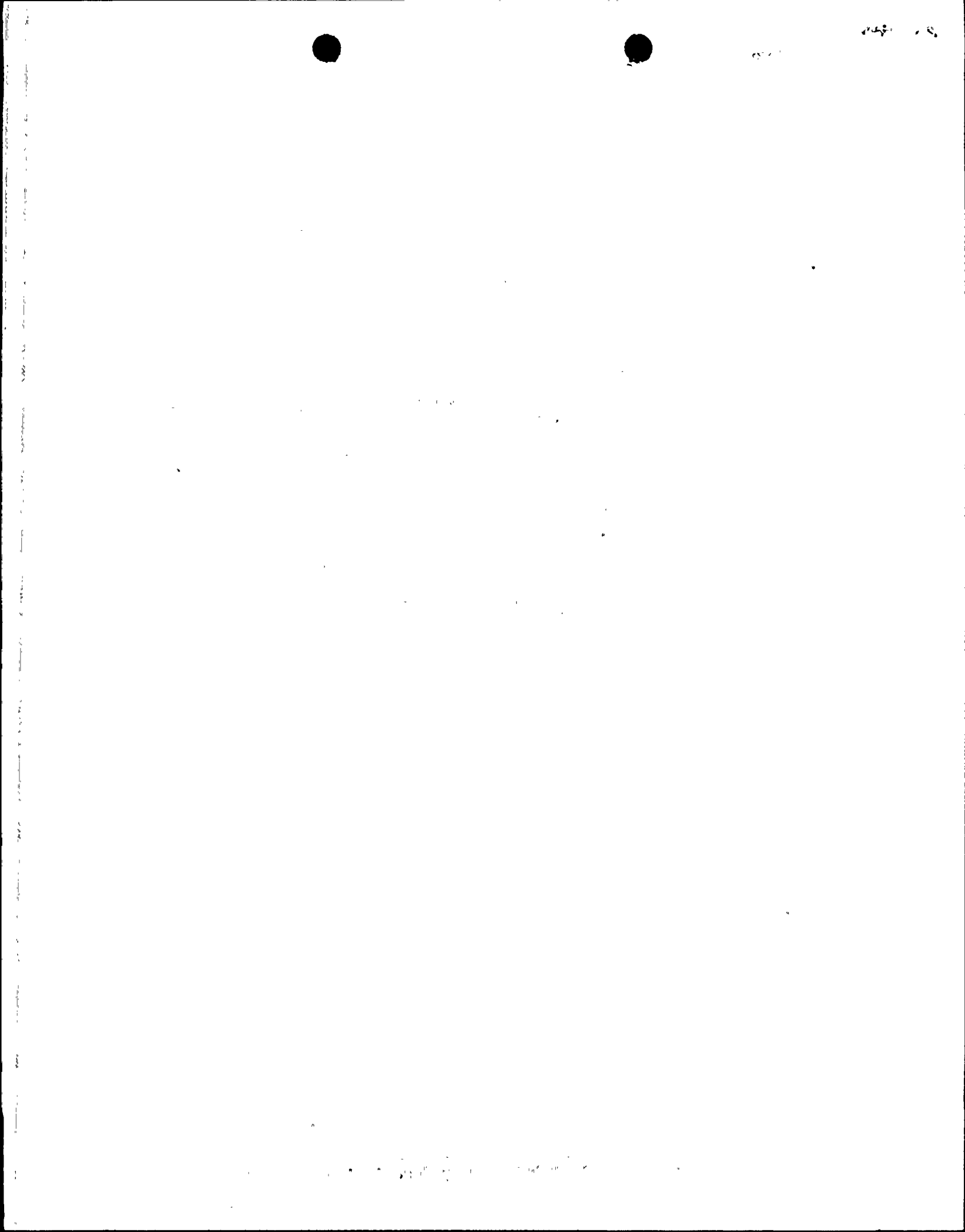


- the AFW system will not occur. For a description of the APS start-up testing commitment to be performed, refer to PVNGS FSAR Section 10A, question 10A.24.
13. Page 10-19 (10.4.9.2.g) Steam generator level is not controlled automatically by level signals to the AFWS control valves. Rather, the system cycles on level switch signals. See also CESSAR FSAR, Section 7.3.1.1.10.7.
 14. Pages 11-1 (11.1), 11-2 (11.2.1), Table 11.1, 11-9 (11.2.1.2), 11-10 (11.2.1.3) and 15-8 (15.4.9) refer to "shim bleed" which is not defined in the FSAR. A definition should be provided by NRC in the SER.
 15. Page 12-2 (12.1.1) The statement "The Radiation Protection Supervisor and the Health Physics personnel periodically review, update, and modify all plant design features, as well as all operating and maintenance features, as appropriate, using exposure data and experience gained from operating nuclear power plants," is overly broad and does not accurately reflect the responsibilities as outlined in the PVNGS FSAR, Section 12.5.1.
 16. Page 12-4 (12.1.5) In paragraph 2, "foreman" should be "personnel" per FSAR, Figure 13.1-6.
 17. Page 12-11 (12.5.4) PVNGS has not committed to all plant personnel being badged, rather only those entering the restricted area. Likewise, the bioassay program may use the whole body counter or alternative methods. For more information, see PVNGS FSAR, Section 12.5.3.6.
 18. Page 13-6 (13.1.1.2) Paragraph 3, "Incumbent" is misspelled.
 19. Page 13-7 (13.1.1.2) Paragraph 7, "Plant Manager" should be "Manager of Nuclear Operations." (Refer to FSAR, Figure 13.1-6).
 20. Page 13-9 (13.1.1.2) Paragraph 5 "The Chemical and Environmental Services Section" should be "Technical Services Section." Refer to FSAR, Figure 13.1-6.
 21. Page 13-19 (13.2.2) "Training Director" should be "Training Manager" (in two places). Refer to FSAR, Figure 13.1-6.
 22. Page 13-22 (13.4.3.a) First sentence should have "ISEG" in place of "Safety Audit Committee." Our response in FSAR question 13A.26 (page 13A-19) will be revised in a future amendment.
 23. Page 20-10 (Table 20.2) "South Carolina" should be "Southern California."



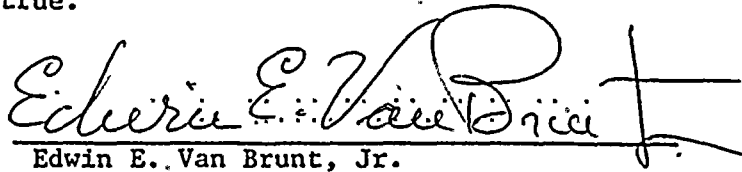
Comments on SER Related to the Operation of PVNGS
NUREG-0857 dated November, 1981

1. Page 6-1 (6.1.1) Second paragraph reads in part, "(concentration 1720 ppm boron)." The paragraph should read "(Concentration 4400 ppm maximum)" from FSAR 6.1.1.2 (page 6.1-7).
2. Page 6-10 (6.2.2) Second paragraph implies that the operator must close the RWT isolation valve to complete the transition from safety injection mode to recirculation mode. However, closure of the RWT isolation valves is not mandatory as discussed in FSAR Section 6A, Question 6A.42.
3. Page 6-17 (6.2.4) Second paragraph references a valve numbered CH-HV525, the correct number is CH-HV524. Refer to FSAR Table 6.2.4-1 Sheet 6 of 8.
4. Page 6-25 (6.3.3) APS' demonstration of power actuation and flow delivery will occur during preoperational (rather than pre-service) testing. Refer to FSAR Chapter 14 for definition.
5. Page 8-20 (8.4.5) Second paragraph, the correct valve numbers are JSIAUV634, JSIAUV644, JSIBUV614, and JSIBAU624 as discussed in FSAR Appendix 8A, Question 8A.13 (page 8A-19).
6. Page 9-4 (9.1.2) Part II (second sentence) states, "The pool contains... approximately 2000 ppm of boric acid." Please note that the 2000 ppm was an assumption used in evaluating criticality safety for a dropped bundle accident. Actual concentration will be 4000-4400 ppm. Refer to FSAR, Section 9.1.2.3.1 and FSAR Table 9.1-1.
7. Page 9-6 (9.1.3) The description given in the third paragraph is inaccurate. For better information see PVNGS FSAR, Section 9A.34.
8. Page 10-2 (10.2.1) In paragraph 4, point 5 should read "(5) Prolonged Loss Generator Stator Coolant." Refer to FSAR Section 10.2.2.4, page 10.2-9A.
9. Page 10-10 (10.4.4) Paragraph 4 describing the testing of the turbine bypass system does not agree with PVNGS FSAR Section 10.4.4.3 which describes the testing to be performed.
10. Page 10-12 (10.4.6) Second paragraph implies that the CDS serves only during start-up and periods of condenser leakage, however it may be used continuously also. Refer to FSAR Section 10.4.6.
11. Page 10-16 (10.4.9.1.d) "Condensate storage pool" should be "Condensate storage tank."
12. Page 10-18 (10.4.9.2.c) APS has not committed to a start-up test using standard operating procedures to verify unacceptable water hammer in

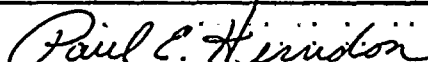


STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President Nuclear Projects of Arizona Public Service Company, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority so to do, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true.


Edwin E. Van Brunt, Jr.

Sworn to before me this 16TH day of APRIL, 1981


Notary Public

My Commission expires:

My Commission Expires Dec. 22, 1985

