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 VAN BRUNT, E. E. Arizona Public Service Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 TEDESCO, R. L. Assistant Director for Licensing

SUBJECT: Responds to 820701 request for info re functionability of  
 pressurizer safety valves per NUREG-0737, Item II. D. 1. A.  
 Hydraulic & structural modeling of valve discharge piping  
 sys scheduled for completion on 821201.

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June 29, 1982  
ANPP-21270-WFQ/KEJ

Mr. R. L. Tedesco  
Assistant Director of Licensing  
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: 82-013-040/82-056-026/G.1.10

Reference: Letter from E. E. Van Brunt, Jr., APS, to R. L. Tedesco, NRC,  
dated March 31, 1982

Dear Mr. Tedesco:

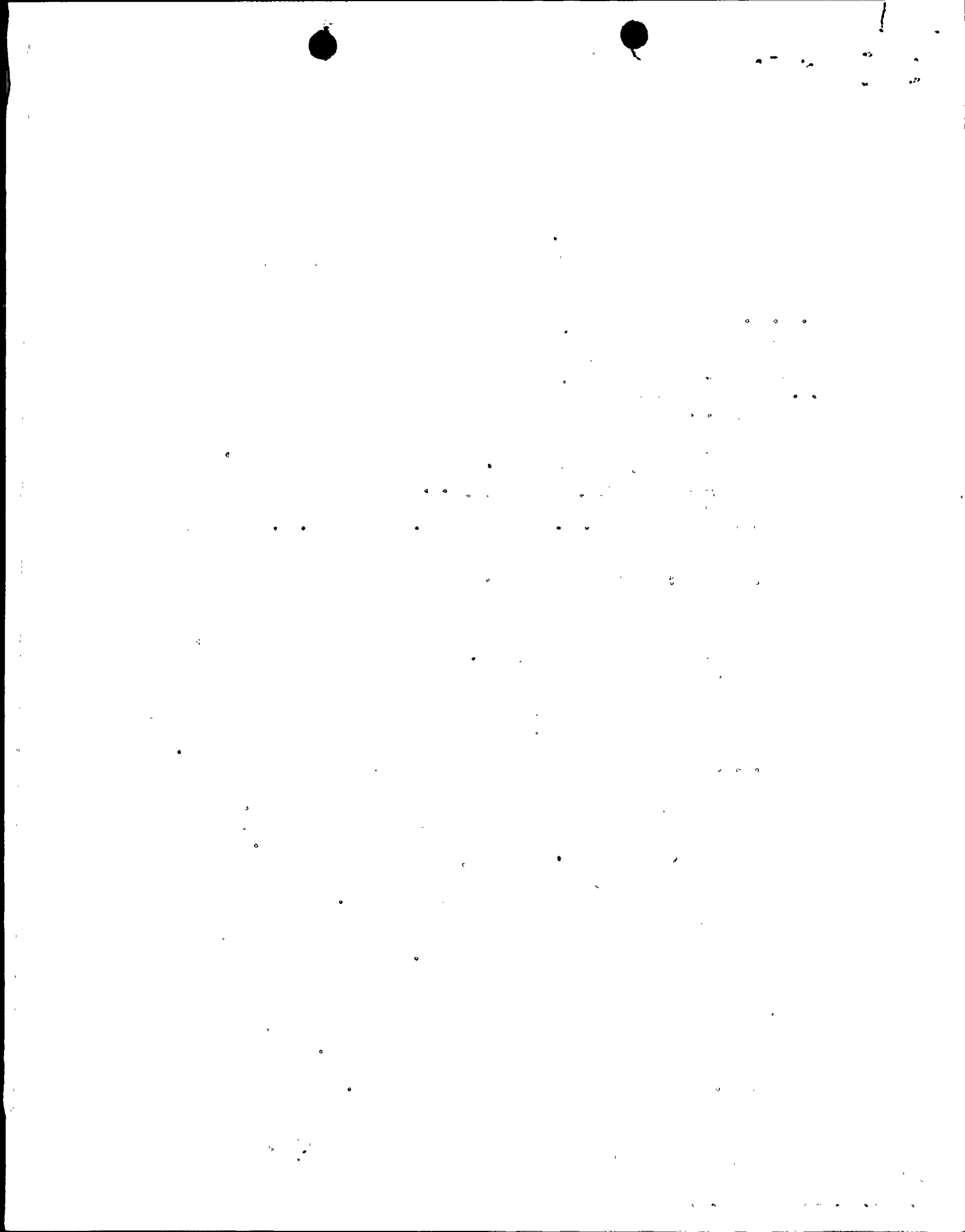
The reference letter submitted the Arizona Public Service (APS) preliminary evaluation of relief and safety valves applicable to PVNGS Units 1, 2 and 3, in response to the April 1, 1982, U.S. Nuclear Regulatory Commission submittal request.

The purpose of this letter is to provide the APS response to the July 1, 1982, NRC request for a submittal that addresses the functionability of the pressurizer safety valves that are installed in the PVNGS system. Item II.D.1.A of NUREG-0737 required that utilities operating and/or constructing Pressurized Water Reactor (PWR) power plants provide evidence, supported by test, of safety and relief valve functionability. In response to these requirements, the Electric Power Research Institute (EPRI) implemented a generic test program on behalf of the PWR utilities. APS has been a participant in the EPRI program. The NRC Generic Letter 81-36 dated September 19, 1981, contains a schedule for the submittal of test results and the submittal of plant-specific reports. In accordance with this schedule, results of the EPRI program, summarized in various EPRI reports, were forwarded to the NRC on April 1, 1982, in parallel with distribution to the participating utilities.

In order to facilitate an expeditious evaluation of the test data, the utilities operating and construction Combustion Engineering (C-E) designed plants have, through the C-E Owners Group, requested that C-E implement a program to evaluate and apply the EPRI test results. The C-E Owners Group program was subsequently initiated in April, 1982, and is currently in progress. APS is a participant in this program.

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The approach being applied by the C-E Owners Group is to show that particular EPRI tests were directly representative of plant-specific safety and relief valve models and valve installations, and that acceptable valve operation was demonstrated.

With regard to the evaluation of safety valves, our review of the EPRI tests has determined that the valves and installations used in PVNGS were represented in the EPRI program and the test conditions enveloped the range of fluid conditions recommended by NUREG-0737. The valve discharge for PVNGS is limited to steam conditions, and the valves are installed on short inlet pipes extending from the pressurizer. This type of arrangement and the steam condition has been shown in the EPRI program to be the most optimum for the valves to perform their function. Although there is no safety concern, future valve adjustments may be beneficial to assure optimal performance. Currently, detailed plant-specific evaluation and application of the EPRI data is being performed as part of the Owners Group program. In addition, input from the valve manufacturers is being requested. That information is expected to be received during the third quarter of 1982, and will then be incorporated into the C-E evaluation. If valve adjustments are necessary, they will be identified in the C-E evaluation based on performance demonstrated by the EPRI tests. The results will be presented in a C-E Owners Group report that is scheduled for completion in December, 1982. Since APS is a participant in the program, the operability of safety valves in the PVNGS system(s) will be addressed by this report. Currently APS expects to receive C-E Owners Group final report by December 15, 1982. After our review, APS intends to transmit the final report to the NRC by about January 31, 1983.

The hydraulic and structural modeling of the pressurizer safety valve discharge piping system for PVNGS has begun, and is also currently scheduled to be completed about December 1, 1982. After our review, APS intends to transmit the discharge piping evaluation to the NRC by about January 31, 1983.

If you have any questions concerning these matters, please contact me.

Very truly yours,



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

EEVB/KEJ/mb

cc: A. C. Gehr  
L. Bernabei, Esq.  
P. Hourihan  
E. Licitra

