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Docket Nos.: 50-528, 50-529
and 50-530

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Phoenix, Arizona 85036

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Dear Mr. Van Brunt:

Subject: Leak Rate Testing of Pressure Isolation Valves - Palo Verde,
Units 1, 2 and 3

By letter, dated February 24, 1983, you submitted revised responses to two NRC questions, concerning inter-system LOCA surveillance requirements, to delete your previously acceptable commitment to conduct periodic testing of certain pressure isolation check valves and a proposal to delete a leak detection criterion for those valves in the Technical Specifications.

The revised responses were based on the probabilities of valve failures. However the failure probabilities used in your revised responses, which are based on the WASH-1400 study, do not address the pressure boundary failures due to valve degradation. In addition, although the Event V intersystem LOCA was partially concerned with bypass of the containment, the concern stated by the staff in Question 3A.15 includes uncontrolled reactor coolant leakage both inside and outside containment. Therefore, your revised responses are not acceptable.

As a result, we request that you delete your revised responses, or provide the basis for, or alternate measures to be taken in lieu of, not performing a leak rate test of those pressure isolation valves for the above stated conditions.

Please advise us as to when you plan to respond to this letter. If you have any questions regarding the letter, you should contact Manny Licitra, the Licensing Project Manager,

Sincerely,

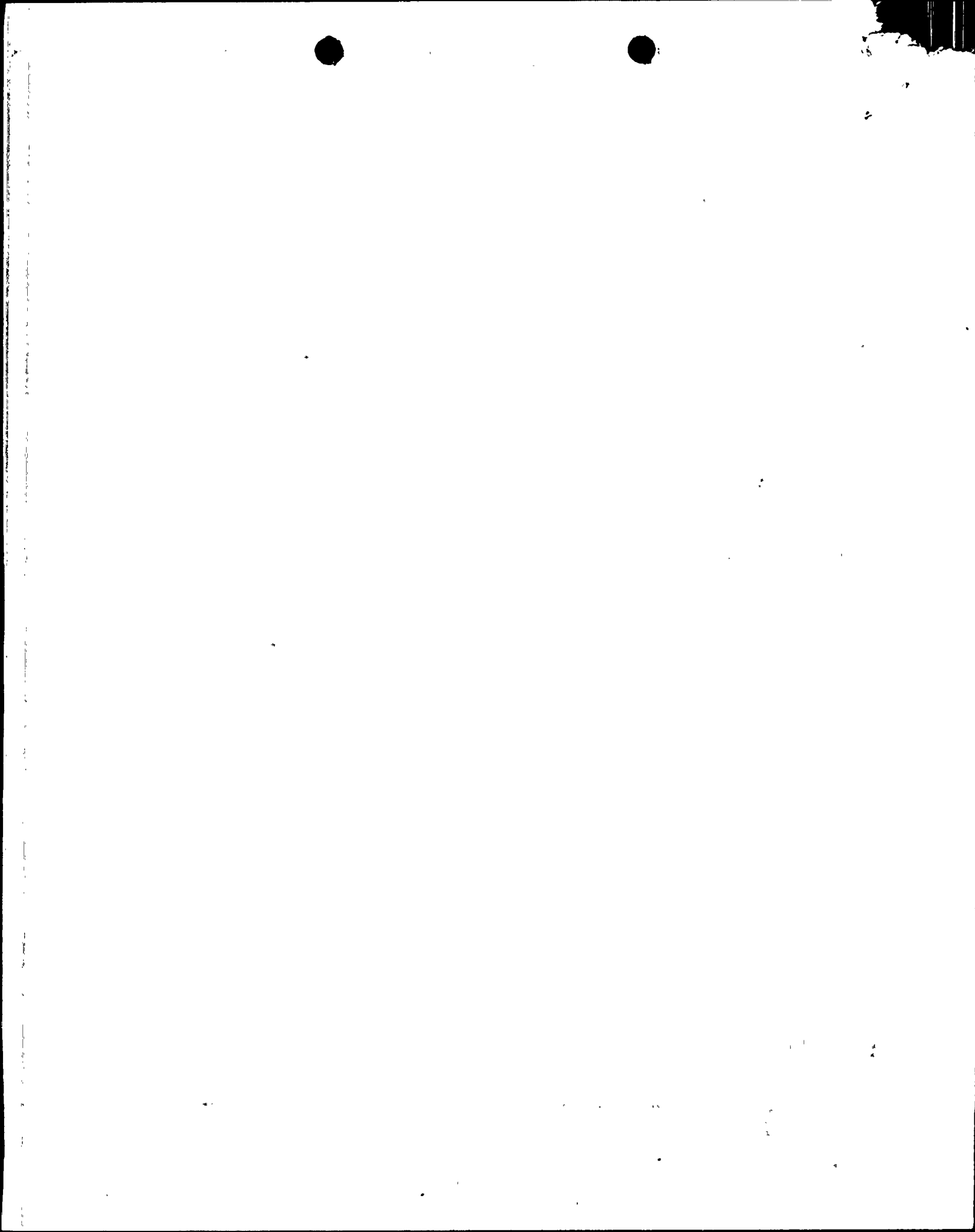
Original signed by:
George W. Knighton

George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing

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cc: See next page

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DATE	4/12/83	4/13/83					



Palo Verde

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