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

Mr. E. E. Van Brunt, Jr.
Vice President-Nuclear Projects
Arizona Public Service Company
Post Office Box 21666
Phoenix, Arizona 85036

Dear Mr. Van Brunt:

Subject: Request for Additional Information, Palo Verde

By letter dated July 15, 1983, you submitted the Procedures Generation Package for Palo Verde in response to Item I.C.1 of the TMI Action Plan (NUREG-0737). As a result of its review, the staff has determined the need for additional information in the following three areas:

1. Using the containment pressure as the criterion for determining large and small LOCA,

2. Removing the pressure restrictions on the safety injection tanks isolation for a LOCA, and

3. Combining of all safety functions dealing with containment.

The specific requests for information in the above areas are provided in the enclosure.

We request that you provide the information requested in the enclosure expeditiously so that the staff can complete its review of the Palo Verde Procedures Generation Package.

If you have any questions regarding this request, you should contact Manny Licitra, the Licensing Project Manager.

Sincerely,

8311160333 831108
PDR ADOCK 05000528
A PDR

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

Enclosure:
As stated

cc: See next page

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DATE			11/17/83	11/18/83			

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REQUEST FOR ADDITIONAL INFORMATION

PALO VERDE NUCLEAR GENERATING STATION

PROCEDURES GENERATION PACKAGE

640.01 On page 12 of Section III of PVNGS PGP, it states that CEN-152 LOCA Guidelines were broken down into two PVNGS documents, one for small LOCA and one for large LOCA. The reason given by PVNGS for developing specific guidelines for a small LOCA and a large LOCA is that the actions for the two are significantly different. A large LOCA is defined as a LOCA which raises the containment pressure to 5 psig or greater. A LOCA which does not raise the containment pressure above 5 psig is designated as a small LOCA.

Our concern is that the operator could be directed to the incorrect procedure if the 5 psig criterion is not valid. We request that you provide (1) or (2) below:

(1) A discussion that justifies the adequacy of using the PVNGS large LOCA guideline for a small LOCA, and vice versa, in terms of the effect of omitting steps required in one guideline and not the other.

(2) An analysis that supports using the large LOCA guidelines for containment pressure 5 psig and greater, and using the small LOCA guidelines for containment pressure less than 5 psig. Also, provide a detailed discussion of the model and assumptions used in the analysis for the primary systems, secondary system and containment..

640.02 In the PVNGS guidelines for the LOCA, step 22 on page 169 isolates the safety injection tanks (SIT) regardless of the pressure in the RCS. The CE guideline, CEN-152, requires that the SIT be isolated at a specific RCS pressure. The typical RCS pressure given in CEN-152 is 250 psia. To justify the removal of the pressure restrictions on the SIT isolation, provide the following:

(1) Demonstrate over a spectrum of large breaks that the effect of injecting a noncondensible gas (nitrogen) into the primary system is negligible.

(2) Show that premature SIT isolation is not likely, or provide an analysis (considering a range of large breaks) that shows that the effect of prematurely isolating the SIT is not a safety concern.

640.03 In the PVNGS Plant Specific Guideline, the safety functions as defined by PVNGS differ from CEN-152 in that RCS inventory and RCS pressure control have been combined and all safety functions dealing with containment have been combined. This change affects the safety function status check, Figure 10-3 in CEN-152, the resource assessment trees, and the specific function recovery guidelines for RCS inventory control, RCS pressure control, containment isolation, containment temperature and pressure, and containment combustible gas control. Provide sufficient information to show that the function recovery guidelines have been combined in such a manner that they reflect CEN-152 generic guidelines, or provide the technical basis, including supporting analysis, for the differences from the generic guidelines.