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Arizona Public Service Company

ANPP-30290-EEVBJr/KEJ August 21, 1984

Director of Nuclear Reactor Regulation Attention: Mr. George Knighton, Chief Licensing Branch No. 3 Division of Licensing U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Subject: Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2, and 3 Categorization of Pressure Isolation Valves. PVNGS ASME Section XI Pump and Valve Testing Program. Docket Nos. STN 50-528/529/530 File: 84-056-026; G.1.01.10

References: (1) Letter from E. E. Van Brunt, Jr., APS, to G. W. Knighton, NRC, dated February 17, 1984 (ANPP-28907). Subject: Categorization of Pressure Isolation Valves.

> (2) Letter from E. E. Van Brunt, Jr., APS, to T. Novak, NRC, dated October 1, 1982 (ANPP-21932). Subject: Rev. 1 to PVNGS ASME Section XI Pump and Valve Testing.

Dear Mr. Knighton:

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A telecon was held on July 13, 1984 between the NRC staff and APS to discuss the reference (1) submittal concerning categorization of Reactor Coolant System (RCS) pressure isolation valves. The staff stated that four (4) additional motor operated valves (MOV) (SIUV-651, SIUV-652, SIUV-653, SIUV-654) of the suction side of the Shutdown Cooling portion of the Safety Injection System (SDCS) were required to be categorized A or AC according to paragraph IWV-2100 of Section XI of the ASME Code since they perform an isolation function from the RCS to the SDCS.

Attachment 1 is Revision 2 to the PVNGS ASME Section XI Pump and Valve Testing Program which updates the reference (2) submittal and provides additional relief requests. Included in Attachment 2 are proposed changes to Rev. 2 indicating that valves SIUV-651 through 654 are categorized A or AC as requested by the staff.

Also attached, please find one (1) set of drawings indicating appropriate boundary locations for preservice and inservice testing per the commitment made to the staff in reference (2).

Attachment 3 is a proposed revision to FSAR question 3A.15 concerning inter system LOCA, which incorporates these additional values into the response. Also discussed in the response are surveillance requirements applied to these values. The four (4) values added to the list of RCS pressure isolation values are two (2) 16" motor operated gate values (MOV) located on the two suction lines of the SDCS. These values are provided with keylock switches and positive position indication in the control room. Also electrical interlocks will prevent the values from opening and will cause the values to go shut at or above a designated pressure.

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, d , Mr. George Knighton Pressure Isolation Valves PVNGS ASME Section XI Pump and Valve Testing Program ANPP- 30290 Page 2

Also located downstream are pressure relief valves providing overpressure protection. Downstream of the second MOV away from the RCS on the low pressure side of the SDCS is a relief valve. Discharge from the relief valve is to the Containment Recirculation Sump, which is located inside the Containment Building.

Since the four (4) MOV's added to the list of RCS pressure isolation valves are provided with position indication and interlocks, and are also provided with overpressure protection that discharges inside containment, APS has applied limited surveillance requirements that are exceptions to the original staff requirement. APS proposes the following surveillance requirement for MOV's SIUV-651 through 654:

Leak rates greater than 1 gpm but less than or equal to 5.0 gpm will be acceptable provided, for each subsequent test, the latest measured leak rate has not exceeded the rate determined by the previous test by an amount that reduces the margin between the measured leakage rate and the maximum permissible rate of 5.0 gpm by 50% or greater. Leakage rates greater than 5.0 gpm are unacceptable. In addition, leak tests shall be performed after the last disturbance at refueling outages and after maintenance or repair. The requirement to test after each disturbance will not apply for the SDCS MOV suction pressure isolation valves (i.e., SIUV-651 through 654).

If accepted by the staff, this surveillance requirement will be included in the PVNGS Technical Specifications. The changes to the PVNGS Technical Specifications will be discussed during the Proof and Review period of that document.

If you have any further questions concerning this matter, please contact me.

Very truly yours,

ZEVan Brunt E. E. Van Brunt, Jr. ACIC

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

EEVBJr/KEJ/mb Attachment

Bill - Car

cc:	A. R.	Licitra Gehr Zimmerman	(w/a) (w/a) (w/a)
	G.	Hammer	(w/a)

ANPP-30290 August 21, 1984

STATE OF ARIZONA)) ss. COUNTY OF MARICOPA)

I, Donald Karner, represent that I am Assistant Vice President, Nuclear Production of Arizona Public Service Company, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority to do so, 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.

Donald Karner

Sworn to before me this <u>Jand</u> day of <u>Ougust</u>, 1984. Mora E. Meador Notary Public

My Commission Expires: My Commission Expires April 6, 1987

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