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 AUTH. NAME AUTHOR AFFILIATION  
 VAN BRUNT, E.E. Arizona Public Service Co.  
 RECIP. NAME. RECIPIENT AFFILIATION  
 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Addresses License Condition 2.C.(19)(f) re implementation of  
 Reg Guide 1.97, Rev 2 by 850531, per 840801 & 1205 ltrs.  
 Condition complete w/three listed exceptions re radiation  
 monitors, core cooling & post-accident sampling.

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 TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737(Generic Ltr 82-33)

NOTES: Standardized plant.  
 OL: 12/31/84

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## Arizona Nuclear Power Project

P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

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

ANPP-32695-EEVB/JKO  
May 22, 1985

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Unit 1  
Condition 2.C(19)(f) Regulatory Guide 1.97  
Docket No. STN 50-528 (License NO. NPF-34)  
File: 85-056-026; G.1.01.10

- References:
- (1) Letter to G. W. Knighton, NRC, from E. E. Van Brunt, Jr., APS, dated December 10, 1984. Supplement 1 to NUREG 0737 (ANPP-31427)
  - (2) Letter to G. W. Knighton, NRC, from E. E. Van Brunt, Jr., APS, dated May 1, 1985. Environmental Qualification (ANPP-32541)
  - (3) Letter to G. W. Knighton, NRC, from E. E. Van Brunt, Jr., APS, dated September 10, 1984. Environmental Qualification (ANPP-30476)
  - (4) Letter to G. W. Knighton, NRC, from E. E. Van Brunt, Jr., APS, dated May 18, 1984. Revised response to the NRC Request for Additional Information on Inadequate Core Cooling Instrumentation (ICCI), (ANPP-29538)
  - (5) Letter to G. W. Knighton, NRC, from E. E. Van Brunt Jr., APS, dated December 5, 1984. Post Accident Sampling System (PASS) (ANPP-31333)

Dear Mr. Knighton:

The purpose of this letter is to address license condition 2.C.(19)(f) which states, "By May 31, 1985 APS shall implement the provisions of Regulatory Guide 1.97, Revision 2, as described in the APS letters August 1, 1984, and December 5, 1984."

This condition is complete with the following exceptions: certain Radiation Monitors, Inadequate Core Cooling Instrumentation (ICCI) System, and Post Accident Sampling System (PASS). These three exceptions, however, are covered by separate license conditions.

The following is a restatement of the license condition covering each of the exceptions and a reference to a commitment for the completion of these items.

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### Radiation Monitors

License condition 2.C(6)(a) states;

#### "Environmental Qualification (Section 3.11, SSER 7)

- (a) Prior to November 30, 1985, APS shall environmentally qualify all electrical equipment according to the provisions of 10CFR 50.49."

The radiation monitors, RU-148,-149,-150,-151, are covered in this license condition. References (2) and (3) provide justification for continued operation. As previously committed in Reference (2) and (3), radiation monitors RU-148 and RU-149 will be environmentally qualified by July 31, 1985, and radiation monitors RU-150 and RU-151 will be environmentally qualified by November 30, 1985.

### Inadequate Core Cooling Instrumentation System

License condition 2.C(8) states;

#### "Inadequate Core Cooling Instrumentation System (Section 22.2 II.F.2, SSER 6)

Prior to initial criticality, APS shall revise the emergency operating procedures to resolve staff comments in SSER 6 on the use of the reactor vessel level monitoring system. Prior to exceeding 5 percent of full power, APS shall submit a report for the ICCI system as described in Appendix D to SER Supplement No. 6."

Reference (4) and the license condition commits ANPP to have the ICCI system operable before exceeding 5 percent power, which is not scheduled to occur before May 31, 1985. As previously committed, ICCI system will be complete and the report submitted before exceeding 5 percent power. The Emergency operating procedures were revised as indicated by letter dated April 15, 1985, (ANPP-32400) which was submitted to the staff.

### Post Accident Sampling System

License condition 2.C.(17) states;

#### "Post Accident Sampling System (Section 22.2, SSER 7)

Prior to exceeding 5 percent of full power, APS shall install and have operable a Post Accident Sampling System which meets the provisions of NUREG 0737 (II.B.3)."

Reference (5) and the license condition require ANPP to have a Post Accident Sampling System operable before exceeding 5 percent power, which will not occur until after May 31, 1985. Therefore, as previously committed, a Post Accident Sampling System as described in Reference (5), will be complete before exceeding 5 percent power.

All other provisions of R.G.1.97, Revision 2 are complete and implemented as previously stated on page 6 of 10 in Reference (1).



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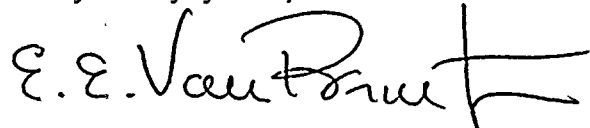
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G. W. Knighton  
Condition 2.C.(19)(f) Regulatory Guide 1.97  
ANPP- 32695  
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Please contact Mr. W. F. Quinn of my staff concerning any questions on this matter.

Very truly yours,

A handwritten signature in cursive script that reads "E. E. Van Brunt, Jr." with a long horizontal flourish at the end.

E. E. Van Brunt, Jr.  
Executive Vice President  
Project Director

EEVB/JKO/slh

cc: E. A. Licitra  
R. Zimmerman