



Arizona Nuclear Power Project

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Mr. John B. Martin, Regional Administrator
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

August 23, 1985
ANPP-33254-EEVB/BJA

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Docket No. STN 50-528 (License No. NPF-41)
Subject: Reactor Power Cutback System
File: 85-056-026; G.1.01.10

Reference: Letter from E. E. Van Brunt, Jr., ANPP, to G. W. Knighton, NRC, dated December 18, 1984 (ANPP-31502). Subject: Post-FDA Proposed CESSAR changes.

Dear Mr. Martin:

The referenced letter contained a change to CESSAR Section 14.2.12.5.6 to place the Reactor Power Cutback System (RPCS) out of service during the Turbine Trip test. The purpose of this submittal is to notify the NRC of changes to the Post-Fuel-Loading Initial Test Program which will allow certain other tests to be performed with or without the RPCS in service. This notification is made in accordance with the provisions of 10CFR 50.59 (b) and License Condition 2.C(5) of License No. NPF-41.

The attachment to this letter contains the following information:

- i) Description of the proposed change.
- ii) PVNGS FSAR change page.
- iii) Summary of the safety evaluation that was performed for the change.

If you have any questions on this matter, please contact Mr. W. F. Quinn of my staff.

Very truly yours,

EE Van Brunt Jr. JH

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

EEVB/BJA/slh
Attachment

cc: E. A. Licitra (all w/a)
A. C. Gehr
R. P. Zimmerman
J. M. Taylor - Director of Inspection and Enforcement

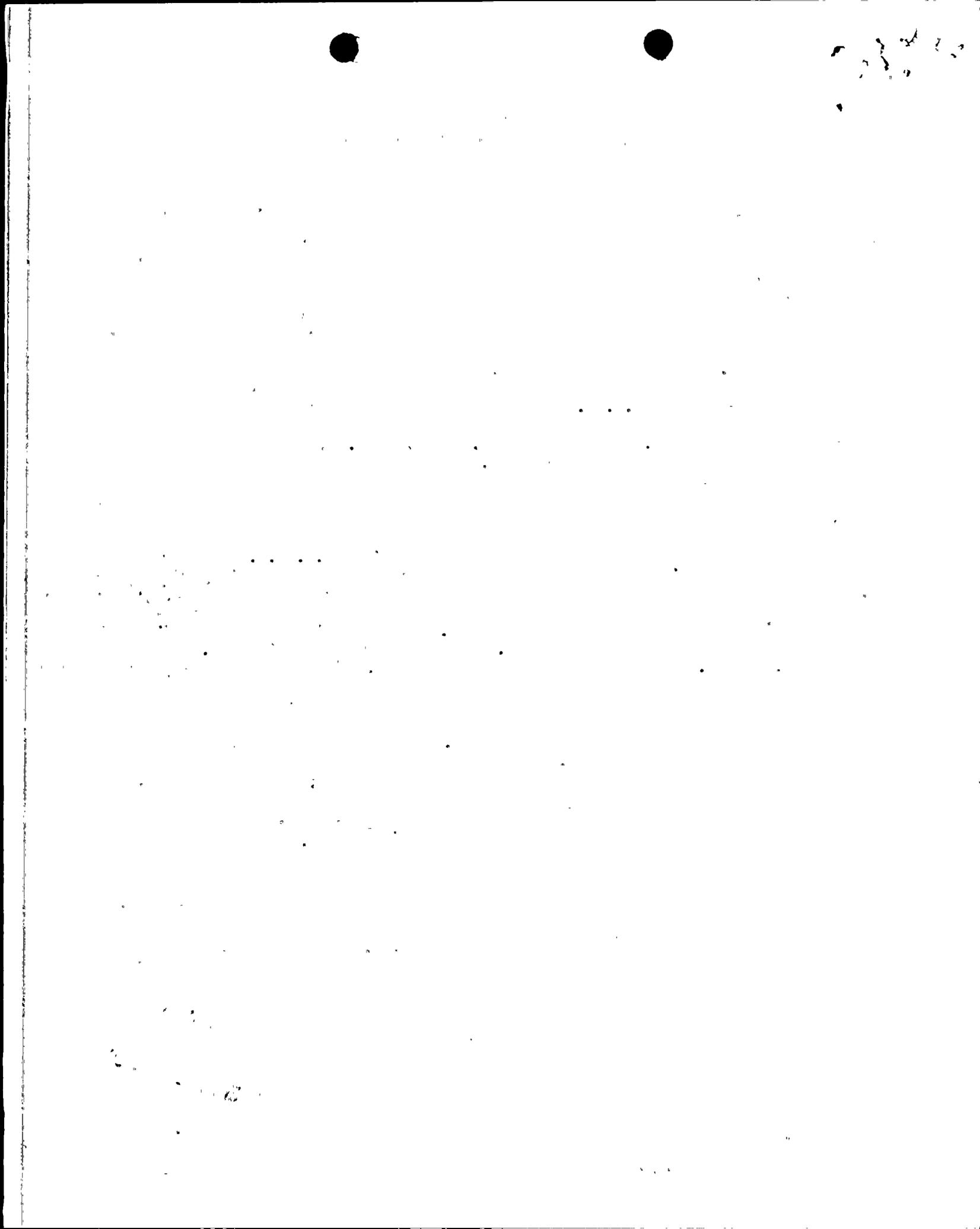
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ATTACHMENT

Description of the Change:

The Reactor Power Cutback System (RPCS) is a non-safety related control system whose function is to reduce reactor power in the event of a turbine trip, load rejection, or the loss of one of the main feedwater pumps. The purpose of this change is to delete the necessity to test the RPCS during four of the tests during the power ascension testing program. However, the latitude will remain to test the RPCS during any of the tests without affecting the acceptance criteria for the tests. The power ascension tests which are affected by this change are listed below along with the section of CESSAR where the tests are described.

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|------|-------------------------------------------|---------------------|
| i) | Unit Load Transient Test | CESSAR 14.2.12.5.3 |
| ii) | Control Systems Checkout Test | CESSAR 14.2.12.5.4 |
| iii) | Unit Load Rejection Test | CESSAR 14.2.12.5.7 |
| iv) | Main and Emergency Feedwater Systems Test | CESSAR 14.2.12.5.17 |

Summary of the Safety Evaluation:

The change to delete the requirement to test the RPCS during the four power ascension tests will not increase the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR. This statement is supported by the fact that the RPCS is a non-safety related system that is not relied upon to prevent an accident or to mitigate the consequences of an accident. The accident analyses for PVNGS do not credit the use of the RPCS to prevent or mitigate an accident. The Reactor Protective System and the Supplementary Protection System are both safety-related systems which will act to trip the reactor in the event of a turbine trip, load rejection, or a loss of one of the main feedwater pumps. Therefore, this change does not create the possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. The RPCS is not addressed in the PVNGS Unit 1 Technical Specifications so there will be no reduction of the margin of safety as defined in the basis for any of the PVNGS Unit 1 Technical Specifications.

FSAR CHANGE PAGE

- 1.9.2.4.13 Power Ascension Test Descriptions for the Unit Load Transient Test, Control Systems Checkout Test, Unit Load Rejection Test, and the Main and Emergency Feedwater Systems Test (CESSAR Sections 14.2.12.5.3, 14.2.12.5.4, 14.2.12.5.7, and 14.2.12.5.17)

The referenced Power Ascension Tests require the Reactor Power Cutback System (RPCS) to be used to maintain the NSSS within operating limits. The PVNGS testing program requires a deviation from CESSAR to allow these tests to be performed with or without the RPCS in service. The RPCS is a non-safety related control system which is described in CESSAR Section 7.7.1.1.6. The RPCS is not required to mitigate the consequences of any design basis accident and is not credited in any of the accident analyses. Failure to have the RPCS available during this testing will have no effect on plant safety since the NSSS will be controlled by safety related systems such as the Reactor Protective System and the Supplementary Protection System.

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