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RECIP. NAME RECIPIENT AFFILIATION
KNIGHTON, G. W. PWR Project Directorate 7

SUBJECT: Informs that addl info re SPDS isolation device testing not supplied by 860901 deadline, per 860730 request. Info will be submitted by 861215. Reasons for delay listed. Requested testing of isolators incorporated into present schedule.

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Arizona Nuclear Power Project
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September 29, 1986
ANPP-38447-JGH/GS/98.05

Director of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Project Director
PWR Project Directorate #7
Division of Pressurized Water Reactor Licensing - B
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Palo Verde Nuclear Generating Station
Units 1, 2 and 3
Docket No. STN 50-528 (License NPF-41)
STN 50-529 (License NPF-51)
STN 50-530
Safety Parameter Display System (SPDS)
File: 86-A-056-026, 86-C-056-026; J.9.02

Reference: (1) Letter dated July 30, 1986, from E. A. Licitra, NRC, to E. E. Van Brunt, Jr., ANPP. Subject: Request for Additional Information - Safety Parameter Display System for Palo Verde.

(2) Letter dated January 10, 1986, from G. W. Knighton, NRC, to E. E. Van Brunt, Jr., ANPP. Subject: Request for Additional Information - Safety Parameter Display System Isolation Devices.

(3) Letter dated April 22, 1986, from E. E. Van Brunt, Jr., ANPP, to G. W. Knighton, NRC. Subject: Safety Parameter Display System.

Dear Mr. Knighton:

In Reference (1), the staff requested that ANPP supply additional information concerning the SPDS isolation device testing by September 1, 1986. The referenced letter required that ANPP perform a Maximum Credible Fault (MCF) test in the transverse mode on the non-IE output of different types of SPDS isolators used in PVNGS Units 1, 2, and 3 and submit revised responses to the questions posed by the staff in Reference (2).

As previously discussed with NRC staff, it was not possible to meet NRC's requested date of September 1, 1986, for the following reasons:

(1) The requirement to conduct the isolation device test is a new work scope item, previously unidentified.

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(2) The original scope of work agreed upon to declare SPDS ready for operation (Reference 2) upon which the Unit 2 License Condition 2.C(8) was based, has a schedule which cannot accommodate the additional isolation device testing and analysis.

(3) Personnel involved in completing the milestones for getting SPDS ready for operation in a timely manner cannot be diverted at this time to perform and evaluate the new test proposed by the staff without jeopardizing the original schedule.

(4) Supplying the requested information to the staff will require ANPP to devote a significant amount of time to gather, analyze and review the test data, which by itself will constitute a separate schedule.

Considering the above reasons, ANPP will submit the response to the staff request (Reference 1) by December 15, 1986. This schedule and the reasons discussed above have been discussed with the staff on multiple occasions during the months of August and early September.

ANPP has, however, decided to incorporate the NRC's requested test of the isolators into the present schedule set for meeting the Unit 2 License Condition. This decision is based on the fact that determination of whether the isolators are adequate for the SPDS to be ready for operation by October 30, 1986, plays an important role in meeting the Unit 2 License Condition 2.C(8).

ANPP recognizes that if the isolators fail the MCF testing to be conducted prior to October 30, 1986, the SPDS although functional, cannot be declared ready for operation. Therefore, Unit 2 License Condition 2.C(8) would not be met.

As a contingency in the event of failure of isolators during the test requested by the staff, ANPP is preparing an amendment request submittal for the Unit 2 operating license. This amendment request will be submitted in the near future.

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

Very truly yours,

J. G. Haynes
Vice President
Nuclear Production

JGH/GS/dlm

cc: O. M. DeMichele
E. E. Van Brunt, Jr.
E. A. Licitra
A. C. Gehr
R. P. Zimmerman