June 30, 1999

MEMORANDUM FOR: Docket File

FROM: Mel B. Fields, Project Manager /s/
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: PALO VERDE NUCLEAR GENERATING STATION - ELECTRONIC TRANSMISSION OF ISSUES TO BE DISCUSSED IN AN UPCOMING PHONE CONVERSATION (TAC NO. MA5008)

By letter dated March 17, 1998, the licensee, Arizona Public Services Company, submitted revised relief requests for the first 10-year inservice inspection (ISI) program for the Palo Verde Nuclear Generating Station, Unit 2. The Idaho National Engineering and Environmental Laboratory (INEEL) staff has reviewed the information provided by the licensee in the subject requests for relief. The attached questions were prepared by INEEL for the NRC and were electronically transmitted to Mr. Scott Bauer of Arizona Public Service Company on June 30, 1999, in preparation for an upcoming telephone conference. This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position. Formal questions, if any, will be developed by the staff after the telephone conference with the licensee.

Docket Nos.: 50-528
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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TECHNICAL LETTER REPORT
FIRST 10-YEAR INTERVAL INSERVICE INSPECTION
REQUEST FOR ADDITIONAL INFORMATION
ARIZONA PUBLIC SERVICES COMPANY
PALO VERDE NUCLEAR GENERATING STATION (PVNGS), UNIT 2
DOCKET NUMBER: 50-529

1. SCOPE

By letter dated March 17, 1998, the licensee, Arizona Public Services Company, submitted the First 10 Year Inservice Inspection (ISI) Program, Revision 2, for Palo Verde Nuclear Generating Station (PVNGS), Unit 2. Contained in the program were requests for relief from ASME Section XI requirements for the first 10-year ISI interval. The Idaho National Engineering and Environmental Laboratory (INEEL) staff has reviewed the information provided by the licensee in the subject requests for relief.

2. INFORMATION REQUIRED

Based on the above review, the following information is required to complete the evaluation of the subject requests for relief.

2.1 Request for Relief No. 7 proposes an alternative to the pressure testing requirements of the Code and Code Case N-498-1 for containment penetrations. The proposed alternative appears to be similar to Code Case N-522 *Pressure Testing of Containment Penetration Piping*, which specifies that 10 CFR 50, Appendix J testing may be used as an alternative to Section XI pressure tests, for certain containment penetration piping. The original relief request (Revision 1) was "applicable only to portions of piping systems that are classified ASME due to penetration of containment building liner plate". Other plants have been allowed to use Code Case N-522 when the Appendix J testing is performed at no less than the peak calculated containment pressure, and procedures and techniques capable of detecting and locating through-wall leakage are used. It is unclear whether Code Case N-522 is applicable for all of the subject piping. If Code Case N-522 is applicable, based on the aforementioned request, confirm that the Appendix J testing will be performed at no less than the peak calculated containment pressure and will use procedures and techniques capable of detecting and locating through-wall leakage. If Code Case N-522 is not applicable, i.e., portions of the subject piping are Code Class

beyond the segment that penetrates containment, describe why the Code requirements cannot be met, and how the use of Appendix J testing provides an acceptable level of quality and safety.

2.2 Request for Relief No. 12 proposes to perform VT-2 visual examination of the small portion of pipe between two Class 1 isolation valves, or between a valve and a blind flange, with the first valve closed. If the first isolation valve is closed, and if the valve is not leaking, the subject pipe segment should not be pressurized. It is unclear what size, and function, the subject piping segments represent, e.g., vent or drain piping, instrumentation, etc. The licensee has described the burden associated with pressurizing these pipe segments, however, in order to authorize the proposed alternative, reasonable assurance of operational readiness is necessary. Please provide information that will describe how the proposed alternative will provide reasonable assurance of operational readiness.

2.3 Request for Relief No. 15 proposes to perform the VT-2 visual examination on selected portions of the Reactor Vessel Head Vent System with the valves closed to system pressure. The licensee has described the burden associated with pressurizing this portion of the system, however, in order to authorize the proposed alternative, reasonable assurance of operational readiness is necessary. Please provide information that will describe how the proposed alternative will provide reasonable assurance of operational readiness.