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SUBJECT: Documents 870323 discussion re making both control element assembly calculators (CEACs) inoperable while performing certain surveillance tests, per Tech Spec 3.3.1, Action 6. Inoperabilaity of CEACs & entry into Action 6 desirable.

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March 30, 1987
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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Docket No: STN 50-528 (License No. NPF-41)
STN 50-529 (License No. NPF-51)
STN 50-530 (License No. NPF-65)
Compliance With Technical Specification 3.3.1,
Table 3.3-1, I.C.1 (CEACs), Action 6
for PVNGS Units 1, 2 and 3
File: 87-001-211

This is to document discussions on March 23, 1987 between Mr. G. W. Knighton, members of the NRC staff and PVNGS staff members in which the subject of making inoperable both CEAC's while performing certain surveillance tests was discussed.

When performing procedures 77ST-9SB11 and 77ST-9SB12, CEAC 1 and 2 Functional Checks, it is necessary to inop that CEAC for which the ST is being performed. During this time, if the other CEAC should auto-restart, or get a calculational error as has been the case in the past, the plant will trip (the same case exists if one CEAC must be taken out for maintenance). This test usually takes approximately 2 hours per CEAC to perform and is performed on a monthly basis. Beginning with the second fuel cycle for each unit, a software modification is planned which will eliminate this trip. This change has already been reviewed and approved by the NRC for other CPC plants.

If we experience a rod mis-alignment, slip or drop a rod as has happened in the past when performing Procedures 41ST-1SF01, 42ST-2SF01, 43ST-3SF01, CEA Operability Checks, a plant trip can occur. This test typically takes about 1.5 hours to perform and is performed on a monthly basis.

As we indicated, ACTION 6 provides the plant with an equivalent if not more conservative degree of protection, including reducing power and changing addressable constants (RSPT/CEAC INOP and BERR1). Operation per ACTION 6 has been fully analyzed by Combustion Engineering. There is no limit on the amount of time that the plant may be operated in ACTION 6.b or 6.c (both CEACs inop). Operation under ACTION 6 is effectively the normal operational mode of CE's plants with an analog protection system.

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Because of this, it is desirable and prudent to inop both CEAC's while performing the above evolutions and enter ACTION 6. This has the overall effect of reducing challenges to the Plant Protection System, and at the same time provide an equivalent or more conservative degree of protection for the plant.

After consultation with members of the NRC staff, Mr. Knighton concurred with our action to proceed with these tests scheduled on Unit 1 and requested we document our discussion via a letter to you.

Please contact R. Bernier of my staff immediately with any concerns.

Very truly yours,

J. G. Haynes
Vice President
Nuclear Production

JGH/RAB/dlm

cc: O. M. De Michele
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