

Arizona Public Service Company

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

161-03304-WFC/GAM
June 25, 1990

Docket Nos. STN 50-528/529/530

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Reference: NRC Letter to All Holders of Operating Licenses and Construction Permits for Nuclear Power Reactors, "Request for Information on the Status of Licensee Implementation of Generic Safety Issues Resolved With the Imposition of Requirements or Corrective Actions (Generic Letter 90-04)," dated April 25, 1990.

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1,2, and 3
Response to Generic Letter 90-04, Status of Implementation of Generic Safety Issues
File: 90-010-026

In response to Generic Letter (GL) 90-04, APS is submitting a summary of the implementation status of generic safety issues (GSI's). The attached table lists the GSI's identified in GL 90-04 and provides the implementation status for each, as requested.

If there are any questions regarding this submittal, please call A.C. Rogers of my staff at (602) 340-4041

Sincerely,



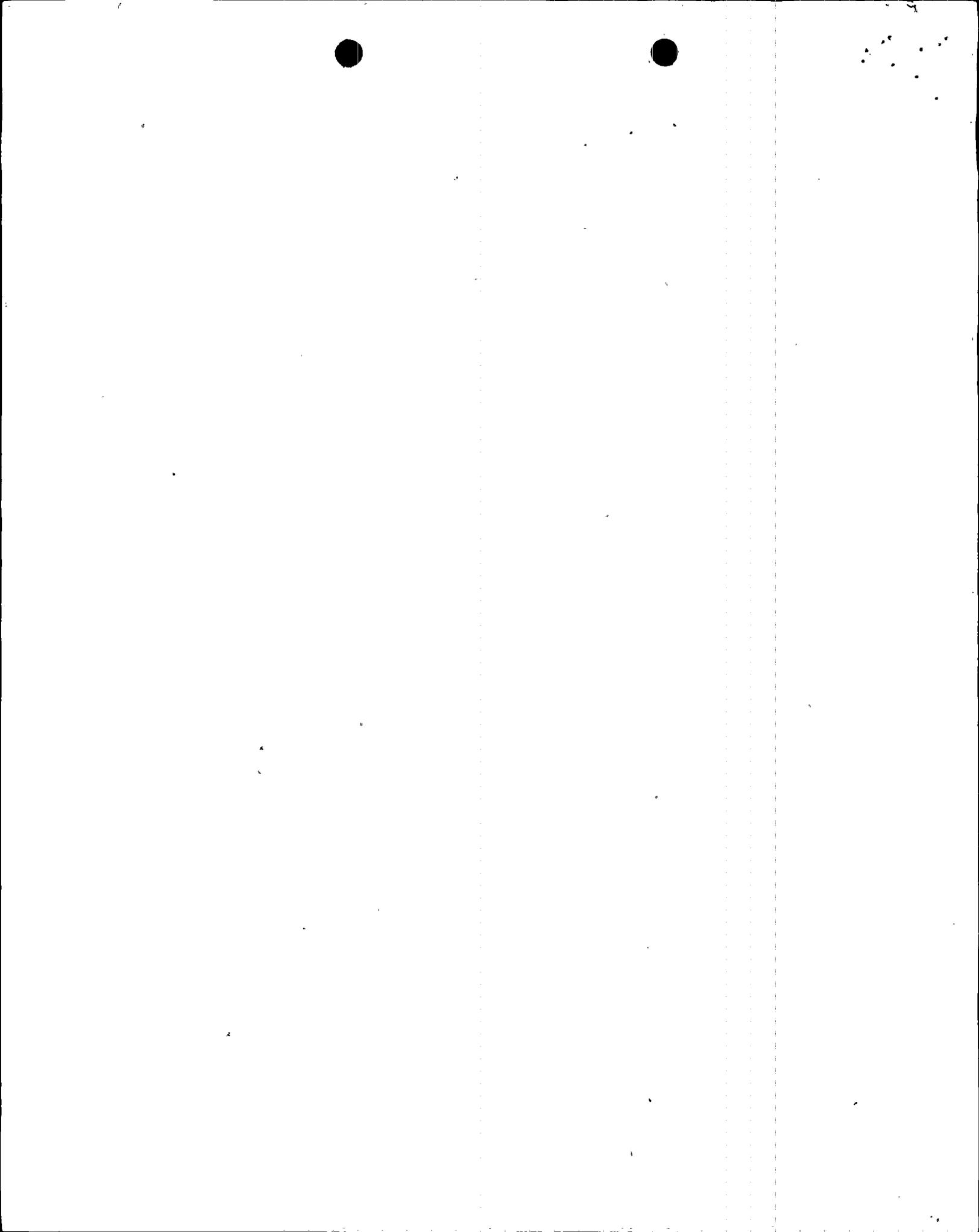
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Attachment

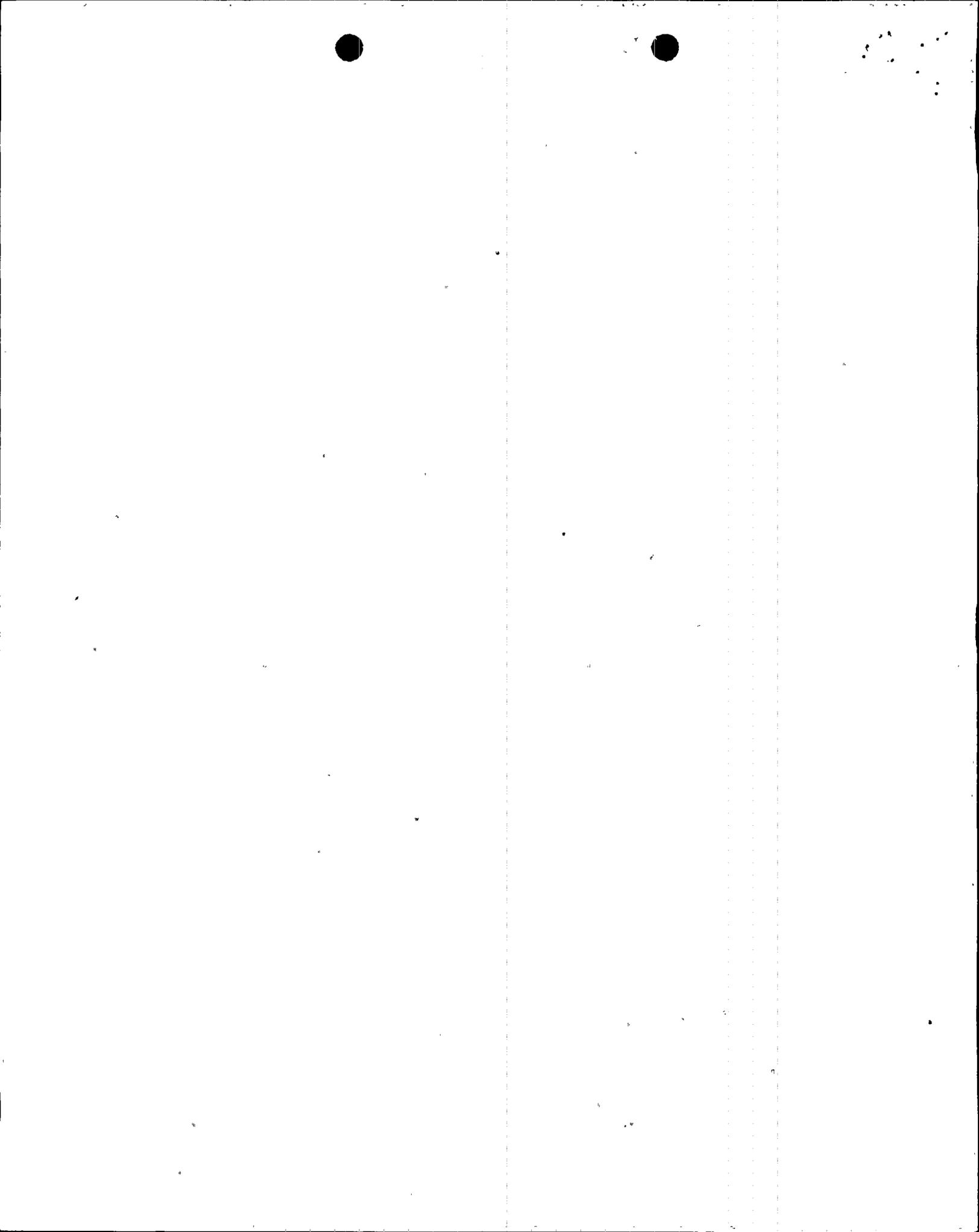
cc: D. H. Coe
J. B. Martin
T. L. Chan
S. R. Peterson
A. C. Gehr
A. H. Gutterman

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GSI/ (MPA No.)	Title	Reference Document(s)	Status	Comments								
40 (B065)	Safety Concerns Associated With Pipe Breaks In The BWR Scram System		NA									
41 (B058)	BWR Scram Discharge Volume Systems		NA									
43 (B107)	Reliability of Air Systems	IN 87-28 IN 87-28, Sup 1 NUREG-1275 GL 88-14	I (All units)	<p><u>APS Letters to NRC:</u></p> <table data-bbox="1239 636 1562 761"> <tr> <td>161-01697</td> <td>02/20/89</td> </tr> <tr> <td>161-01881</td> <td>04/27/89</td> </tr> <tr> <td>102-01474</td> <td>10/16/89</td> </tr> <tr> <td>161-03061</td> <td>05/06/90</td> </tr> </table> <p><u>Outstanding Work/Projected Completion Date</u></p> <ol data-bbox="1207 830 1862 1087" style="list-style-type: none"> 1. Simulator upgrade to include loss of instrument air scenario. All units: 06/91 2. Revise procedures to require instrument air dryer desiccant to be replaced in event of high dew point. All units: 07/90 	161-01697	02/20/89	161-01881	04/27/89	102-01474	10/16/89	161-03061	05/06/90
161-01697	02/20/89											
161-01881	04/27/89											
102-01474	10/16/89											
161-03061	05/06/90											



GSI/ (MPA No.)	Title	Reference Document(s)	Status	Comments
51 (L913)	Improving the Reliability of Open- Cycle Service Water Systems	IEB 81-03 GL 89-13	I (All Units)	<p><u>APS Letters to NRC:</u> ANPP 23294 03/18/83 161-02801 01/26/90</p> <p><u>Outstanding Work/Projected Completion Dates:</u></p> <ol style="list-style-type: none"> 1. Implement revised testing procedure that demonstrates thermal performance and heat transfer capability of service water systems - <ul style="list-style-type: none"> Unit 1: 06/92 (3rd refueling) Unit 2: 01/92 (3rd refueling) Unit 3: 09/91 (2nd refueling) 2. Add additional tasks to the PM program- <ul style="list-style-type: none"> Unit 1: 06/92 (3rd refueling) Unit 2: 01/92 (3rd refueling) Unit 3: 09/91 (2nd refueling) 3. Perform design review of service water systems and perform as-built walkdown inspections- <ul style="list-style-type: none"> Unit 1: 06/92 (3rd refueling) Unit 2: 01/92 (3rd refueling) Unit 3: 09/91 (2nd refueling) 4. Review service water system training - <ul style="list-style-type: none"> All units: 09/91



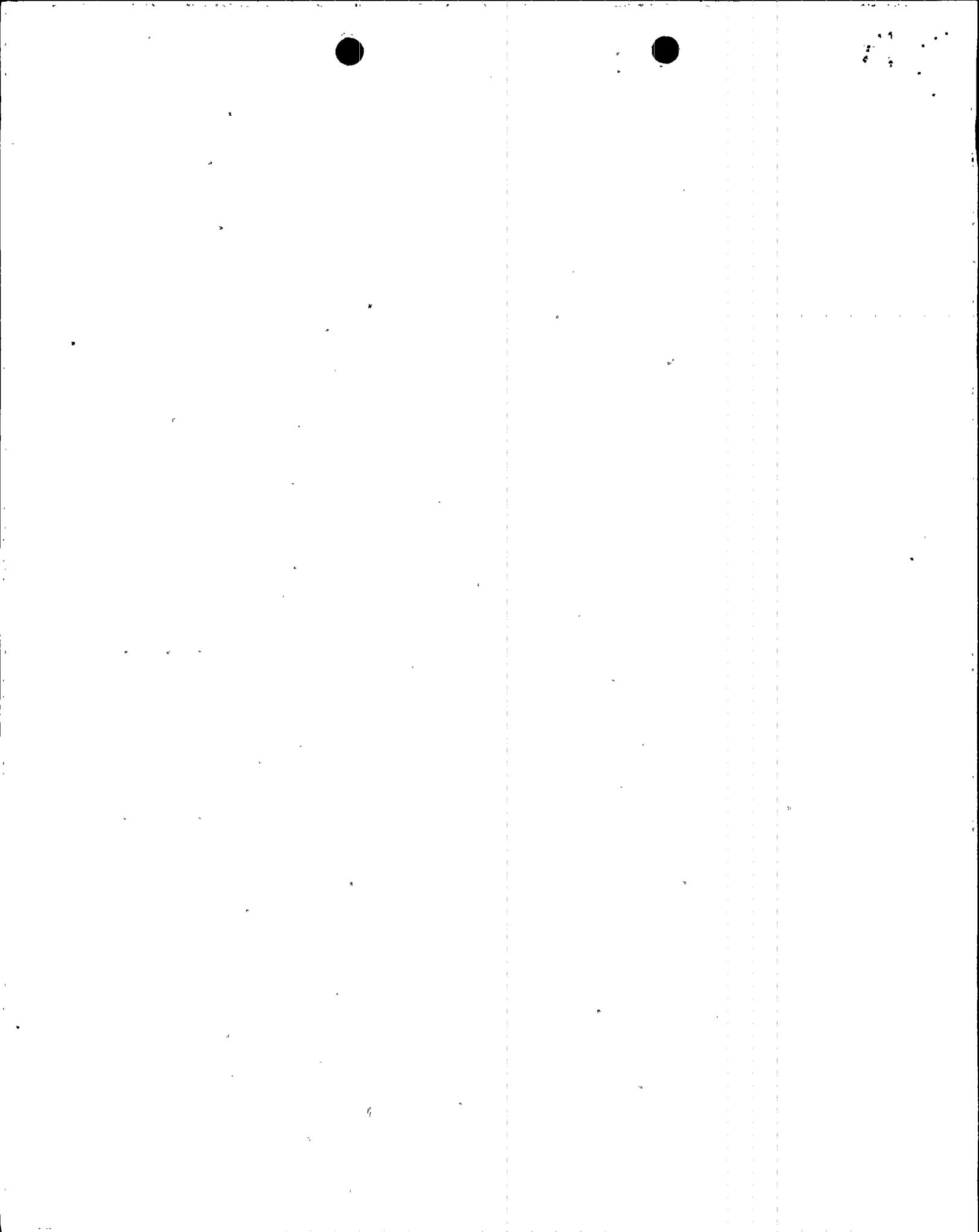
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GSI/ (MPA No.)	Title	Reference Document(s)	Status	Comments/APS Letters to NRC
67.3.3 (A017)	Improved Accident Monitoring	R. G. 1.97, R2 GL 82-33	C (All Units)	ANPP-23505 04/14/83 ANPP-24121 06/17/83 ANPP-30092 08/30/84 ANPP-31334 12/05/84
75	Generic Implications of ATWS Events at the Salem Nuclear Plant	GL83-28 NUREG-1000, Vol 1 & 2		
75 (B076)	Item 1.1 - Post-Trip Review (Program Description and Procedure)		C (All Units)	ANPP-32455 04/19/85
75 (B085)	Item 1.2 - Post-Trip Review - Data and Information Capability		C (All Units)	ANPP-28167 11/03/83
75 (B077)	Item 2.1 - Equipment Classification and Vendor Interface (Reactor Trip System Components)		C (All Units)	ANPP-28167 11/03/83 ANPP-35938 04/03/86 161-00507 09/15/87

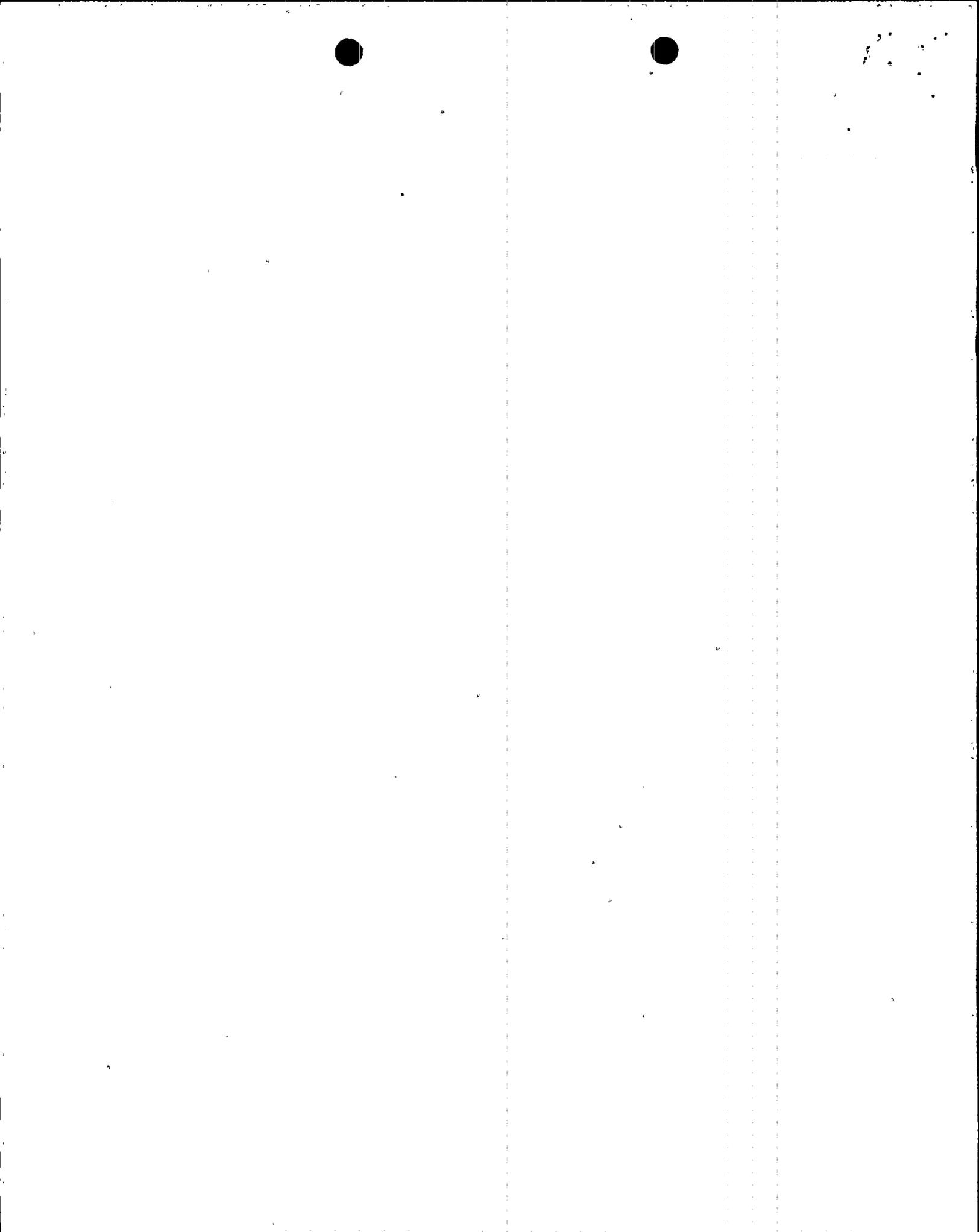


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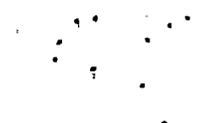
GSI/ (MPA No.)	Title	Reference Document(s)	Status	Comments/APS Letters to NRC
75 (B086)	Item 2.2.1 - Equipment Classifi- cation for Safety- Related Components	GL 90-03	C (All Units)	ANPP-28167 11/03/83 ANPP-35938 04/03/86 161-00507 09/15/87
75 (L003)	Item 2.2.2 - Vendor Interface for Safety- Related Components	GL 90-03 INPO 84-010	C (All Units)	ANPP-30778 10/09/84 ANPP-35938 04/03/86
75 (B078)	Items 3.1.1 & 3.1.2 - Post-Maintenance Testing (Reactor Trip System Components)		C (All Units)	ANPP-28167 11/03/83
75 (B079)	Item 3.1.3 - Post- Maintenance Testing - Changes to Test Requirements (Reactor Trip System Components)		C (All Units)	ANPP-28167 11/03/83
75 (B087)	Items 3.2.1 & 3.2.2 - Post-Maintenance Testing (All other Safety-Related Components)		C (All Units)	ANPP-28167 11/03/83 ANPP-31523 12/18/84 ANPP-32455 04/19/85



GSI/ (MPA No.)	Title	Reference Document(s)	Status	Comments/APS Letters to NRC
75 (B088)	Item 3.2.3 - Post-Maintenance Testing - Changes to Test Requirements (All other Safety-Related Components)		C (All Units)	ANPP-28167 11/03/83
75 (B080)	Item 4.1 - Reactor Trip System Reliability (Vendor-Related Modifications)		C (All Units)	ANPP-28167 11/03/83 ANPP-35939 04/03/86
75 (B081)	Items 4.2.1 & 4.2.2 - Reactor Trip System Reliability - Maintenance and Testing (Preventive Maintenance and Surveillance Program for Reactor Trip Breakers)		C (All Units)	ANPP-28167 11/03/83 ANPP-32455 04/19/85 ANPP-35939 04/03/86
75 (B082)	Item 4.3 - Reactor Trip System Reliability - Design Modifications (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B & W Plants)		NA	



GSI/ (MPA No.)	Title	Reference Document(s)	Status	Comments/APS Letters to NRC
75 (B090)	Item 4.3 - Reactor Trip System Reliability - Tech Spec Changes (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B & W Plants)		NA	
75 (B091)	Item 4.4 - Reactor Trip System Reliability - (Improvements in Maintenance and Test Procedures for B & W Plants)		NA	
75 (B092)	Item 4.5.1 - Reactor Trip System Reliability - Diverse Trip Features (System Functional Testing)		C (All Units)	ANPP-28167 11/03/83 ANPP-32455 04/19/85
75 (B093)	Items 4.5.2 & 4.5.3 - Reactor Trip System Reliability - Test Alternatives and Intervals (System Functional Testing)	CE NPSD-277	C (All Units)	ANPP-28167 11/03/83 ANPP-35938 04/03/86

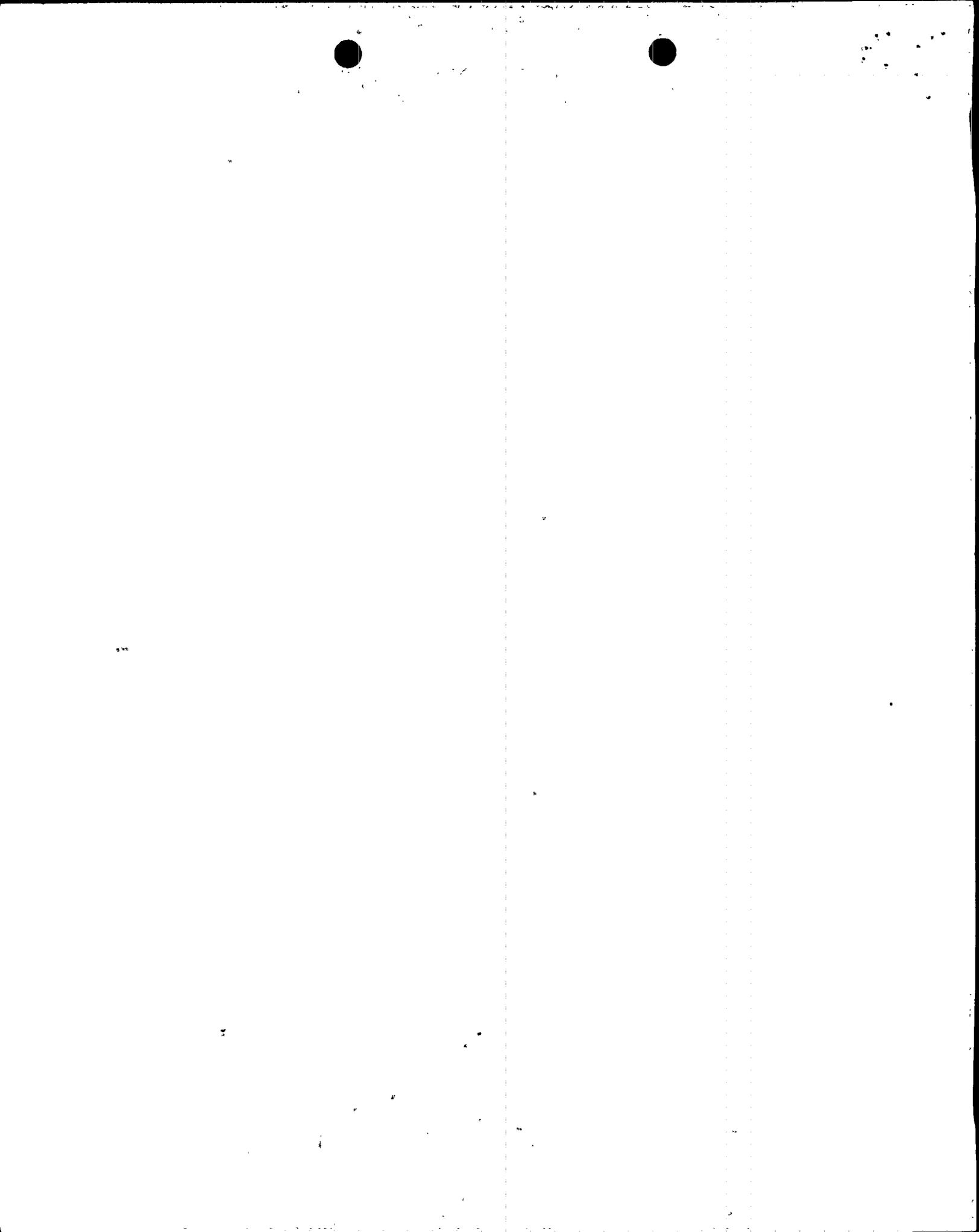


GSI/ (MPA No.)	Title	Reference Document(s)	Status	Comments/APS Letters to NRC
86 (B084)	Long Range Plan for Dealing with Stress Corrosion Cracking in BWR Piping		NA	
93 (B098)	Steam Binding of Auxiliary Feedwater Pumps	IEB 85-01 GL 88-03	C (All Units)	ANPP-35355 02/28/86 161-01057 05/27/88



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GSI/ (MPA No.)	Title	Reference Document(s)	Status	Comments
99 (L817)	RCS/RHR Suction Line Valve Interlock on PWRs	GL 87-12 GL 88-17 NUREG/CR-5015	I (All Units)	<p><u>APS Letters to NRC:</u> 161-00517 09/14/87 161-01597 01/05/89 161-01674 02/06/89</p> <p><u>Outstanding Work/Projected Completion Date:</u></p> <p>1. Install permanent refueling level indication -</p> <p style="padding-left: 40px;">Unit 1: 06/92 (3rd refueling) Unit 2: 01/92 (3rd refueling) Unit 3: 09/91 (2nd refueling)</p> <p>2. Install shutdown cooling system low- flow alarm -</p> <p style="padding-left: 40px;">Unit 1: 06/92 (3rd refueling) Unit 2: 01/92 (3rd refueling) Unit 3: 09/91 (2nd refueling)</p>



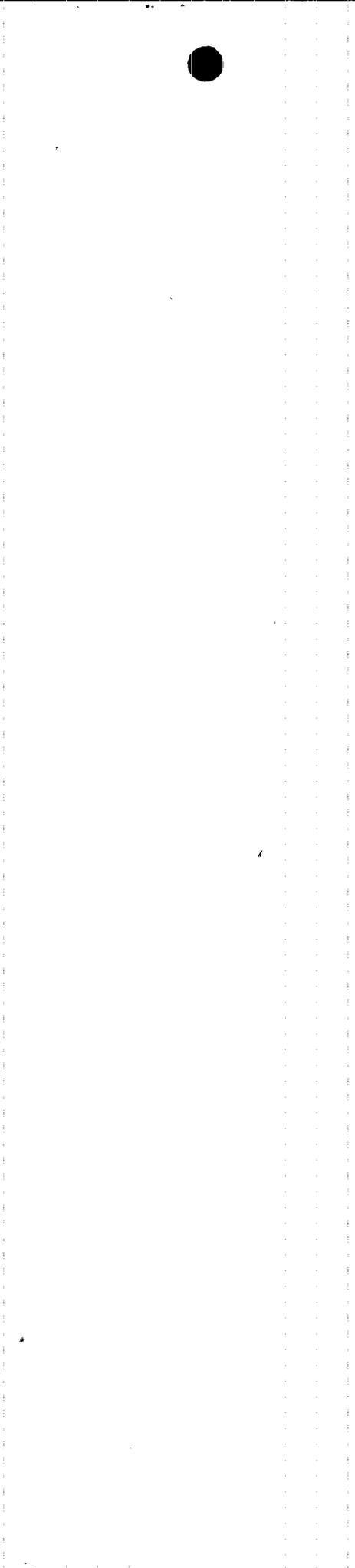
GSI/ (MPA No.)	Title	Reference Document(s)	Status	Comments
99 (Cont.)				<p>4. Tech Spec Changes</p> <p>a. Elimination of auto closure interlocks for SDCS suction valves -</p> <p style="padding-left: 40px;">All units: 01/91</p> <p>b. Reduction of SDCS flow rate requirement -</p> <p style="padding-left: 40px;">All units: 10/90</p> <p>5. ISEG review of RCS perturbations after experience with new procedural controls -</p> <p style="padding-left: 40px;">Unit 1: 07/90 Unit 2: 01/92 (3rd refueling) Unit 3: 09/91 (2nd refueling)</p>



GSI/ (MPA No.)	Title	Reference Document(s)	Status	Comments
124	Auxiliary Feedwater System Reliability		NA	
A-13 (B017)	Snubber Operability Assurance - Hydraulic Snubbers	NRC LTR 11/20/80 NRC LTR 03/23/81	NC (All Units)	Incorporated in CE Standard Technical Specifications which were basis of PVNGS Technical Specifications
A-13 (B022)	Snubber Operability Assurance - Mechanical Snubbers	NRC LTR 11/20/80 NRC LTR 03/23/81	NC (All Units)	Incorporated in CE Standard Technical Specifications which were basis of PVNGS Technical Specifications
A-16 (D012)	Steam Effects on BWR Core Spray Distribution		NA	
A-35 (B023)	Adequacy of Offsite Power Systems	NRC LTR 08/08/79 BTP PSB-1 07/81	NC (All Units)	Incorporated into licensing review of PVNGS
B-10	Behavior of BWR Mark III Containments		NA	
B-36	Develop Design, Testing and Maintenance Criteria for Atmosphere Cleanup System Air Filtration and Adsorption Units for Engineered Safety Features Systems and for Normal Ventilation Systems	R.G. 1.52, R2 R.G. 1.140, R1	NA	Applicable to all plants with operating license applications after 04/01/80. PVNGS operating license application was forwarded to NRC 10/01/79.



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GSI/ (MPA No.)	Title	Reference Document(s)	Status	Comments
B63 (B045)	Isolation of Low Pressure Systems Connected to the Reactor Coolant System Pressure Boundary	WASH 1400 (NUREG-75/014)	NC (All Units)	Incorporated into PVNGS Technical Specifications

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