

JUL 27 1990

Docket No. 50-530

Arizona Public Service Company  
P.O. Box 53999  
Phoenix, Arizona 85072-3999

Attn: Mr. William F. Conway  
Executive Vice President, Nuclear

Gentlemen:

Subject: Temporary Waiver of Compliance Regarding Palo Verde Unit 3  
Technical Specification Requirement 3.6.3

In your letter dated July 27, 1990, and in discussions with the NRC staff on July 27, 1990, you requested temporary relief from Technical Specifications (TS) Action Statement 3.6.3, regarding the length of time to restore the feedwater containment isolation valves to operable status after removal from service for the purpose of inspecting "O" rings contained in the valve operator four-way valves. You estimate that the work may take approximately 12 hours per valve. TS 3.6.3 allows only four hours to restore the associated valves to an operable status. You concluded that extending the allowed out-of-service time from four hours to twelve hours when operating at 100% power involves no significant reduction in safety and that no new accidents were introduced for the following reasons:

- The redundant valves in each feedwater line will be tested for operability prior to commencing work on the feedwater isolation valves.
- There are two check valves installed on each feedwater line inside containment in series with the isolation valves to prevent leakage outside containment in the event of a feedwater line break.
- The isolation valve work will only be done on one valve at a time.
- Prior to the commencement of this work, personnel will be thoroughly briefed on the activity, the possible problems which may occur while the work is in progress, and the appropriate response to the problems.
- The control room operators will be prepared should an isolation signal occur while work on the isolation valve is ongoing. If there are any indications that the redundant feedwater isolation valve fails to fully close, the handswitch in the control room will be used to attempt closure and if the valve fails to close, the feedwater pumps will be tripped, the feedwater pump discharge valves closed from the control room, and auxiliary feedwater will be initiated.

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- Work on similar replacements on the Feedwater Isolation Valves and the Main Steam Isolation Valves were previously successfully done while at power.

Based on the above and based on discussions with NRR, a temporary waiver of compliance for the subject TS action statement only is granted from 5:00 p.m. (MST), July 27, 1990 to expire at 11:00 p.m. (MST), July 31, 1990. This temporary waiver extends the allowable time for the feedwater isolation valves to be inoperable from four to twelve hours; however, entry into TS Action Statement 3.6.3.1.a for this extended period shall be made only once for each feedwater isolation valve. All other TS requirements remain in affect.

If our understanding concerning your actions is not corrected, you should promptly notify this office.

Sincerely,

*RS*

R. P. Zimmerman, Director  
Division of Reactor Safety  
and Projects

- cc: J. Martin, RV  
T. Murley, NRR  
J. Taylor, EDO  
J. Lieberman, OE  
J. Partlow, NRR  
D. Crutchfield, NRR  
B. Boger, NRR  
J. Larkins, NRR  
C. Trammell, NRR  
A. Mendoza, NRR  
S. Peterson, NRR

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SEND TO PDR
<input checked="" type="checkbox"/> YES / NO

*B. Boger, NRR  
CONCURRENTLY IN  
WAIVER AS DESCRIBED  
IN APS LTR 7/27/90 -  
PER TELECON W/ C.  
TRAMMELL ON 7/27/90  
HJW*



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