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 AUTH.NAME AUTHOR AFFILIATION
 LEVINE,J.M. Arizona Public Service Co. (formerly Arizona Nuclear Power
 RECIPIENT AFFILIATION
 MARTIN,J.B. Region 5 (Post 820201)

See Rpt.

SUBJECT: Forwards suppl to Rev 0 to Incident Investigation Rept
 3-3-91-014, "Unidentified Ball Bearings Found in
 Containment," in response to H Wong request for results of
 investigation in 910409 event.

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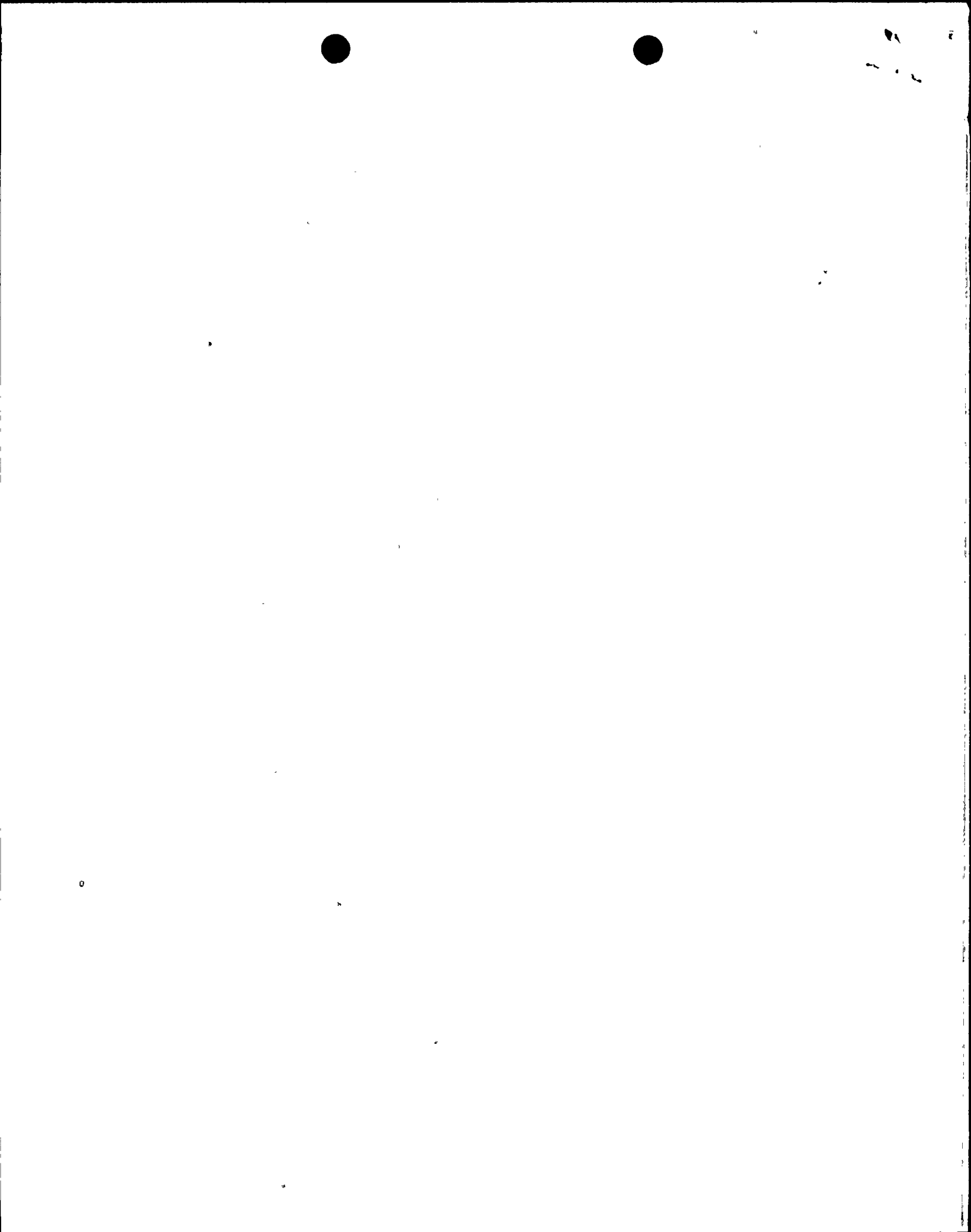
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Arizona Public Service Company
PALO VERDE NUCLEAR GENERATING STATION
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102-02030-JML/TRB/DAJ
May 16, 1991

JAMES M. LEVINE
VICE PRESIDENT
NUCLEAR PRODUCTION

Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

- References: (a) Letter No. 161-00826-EEVB/JRP, dated February 25, 1988, from E. E. Van Brunt, Jr. to J. B. Martin, Justification for Continued Operation - Inability of CEA 56 to Drop.
- (b) Letter No. 161-00851-EEVB/MRO, dated March 2, 1988, from E. E. Van Brunt, Jr. to J. B. Martin, Request for Additional Information - Justification for Continued Operation: Re: Inability of CEA 56 to Drop.

Dear Mr. Martin:

Subject: Palo Verde Nuclear Generating Station (PVNGS) Unit 3
Docket No. STN 50-530 (License No. NPF-74)
Request for Information - Foreign Material Exclusion From
Unit 3 Reactor Coolant System (RCS)
File: 91-070-026

This letter is in response to a request by Mr. Howard Wong of your staff, to provide the results of Arizona Public Services' investigation into an April 9, 1991, event wherein ball bearings were discovered in the Unit 3 containment near the vicinity of the Reactor Vessel cavity. Mr. Wong discussed this request with Mr. Thomas R. Bradish, of my staff, on May 3, 1991, and again with me on May 7, 1991. In these discussions, Mr. Wong noted three (3) items which did not appear to be addressed by the applicable APS Incident Investigation Report (IIR) when reviewed by Mr. Doug Coe, Senior Resident Inspector.

The first item involved the completeness of the discussion of actions taken to verify that no ball bearings had entered Zone III areas (e.g., Reactor Vessel Cavity) adjacent to where the ball bearings were found. As I mentioned to Mr. Wong, in addition to the actions described in the IIR reviewed by Mr. Coe, a walkdown was performed of the nearby Zone III areas by Quality Control personnel. No ball bearings were found in these areas. The IIR has been supplemented to discuss the walkdown and a copy of the IIR is attached for your information.

The second item concerned conclusions that, in the unlikely event some ball bearings had entered the RCS undetected, they would not present a safety concern. APS Engineering has performed an engineering evaluation (attached) of the effects that the ball bearings may have if inadvertently introduced

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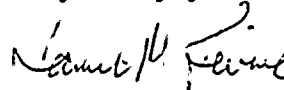
into the RCS. The engineering evaluation was based in part on previous analyses which were performed in support of a January, 1988, event in Unit 1 wherein a Control Element Assembly would not drop due to ball bearing interference. APS submitted a Justification for Continued Operation (References a and b) which detailed the bases of the analyses. The results of the recent engineering evaluation show that there would be no undue risks to the health and safety of the public if one or more of the ball bearings inadvertently entered the RCS.

The third item concerns the fact that the source of the ball bearings could not be determined. It was suggested that in order to ensure any future ball bearings found in the containment are readily identifiable, a composite list be developed of all potential sources of ball bearings. APS has carefully reviewed this suggestion and determined that the practicality of developing and maintaining such a list outweighs the potential benefits. The list's utility would be limited because many different components use the same size and type ball bearings making it difficult to identify all potential sources of ball bearings. Therefore, APS does not plan to develop such a list.

Please be assured that we are very sensitive to issues concerning the possible introduction of foreign material into safety systems. APS has developed and implements a Foreign Material Exclusion Program which provides assurance that safe operation of the plant will not be impaired by the introduction of foreign material into safety systems. Additionally, APS will include a reminder to employees, at the beginning of each refueling outage, of the necessity to adhere to the FME Program. Also, employees will be reminded of the importance to immediately notify their supervisor should they suspect that the FME Program has been compromised.

The attached revised IIR and the discussion above should assist in your understanding of this matter. However, if you have any further questions regarding this matter, please contact me.

Very truly yours,



JML/TRB/DAJ

Attachment

cc: W. F. Conway (all with attachment)
D. H. Coe
A. C. Gehr
A. H. Gutterman
INPO Records Center