



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE
WALNUT CREEK, CALIFORNIA 94596-5368

Docket No. 50-529

March 16, 1992

Arizona Public Service Company
P. O. Box 53999, Sta. 9012
Phoenix, Arizona 85072-3999

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

Gentlemen:

SUBJECT: REGION V TEMPORARY WAIVER OF COMPLIANCE TO PALO VERDE UNIT 2
TECHNICAL SPECIFICATION (TS) LIMITING CONDITIONS FOR OPERATION
(LCO) 3.5.2 - Emergency Core Cooling System (ECCS), TS 3.6.2.1 -
Containment Spray System (CSS), TS 3.7.1.2 - Auxiliary Feedwater
System (AFS), TS 3.7.3 - Essential Cooling Water System (ECWS),
and TS 3.7.11 - Shutdown Cooling System (SDCS)

This letter documents a temporary waiver of compliance to the subject technical specifications for Facility Operating License No. NPF-51 that was verbally granted on March 15, 1992.

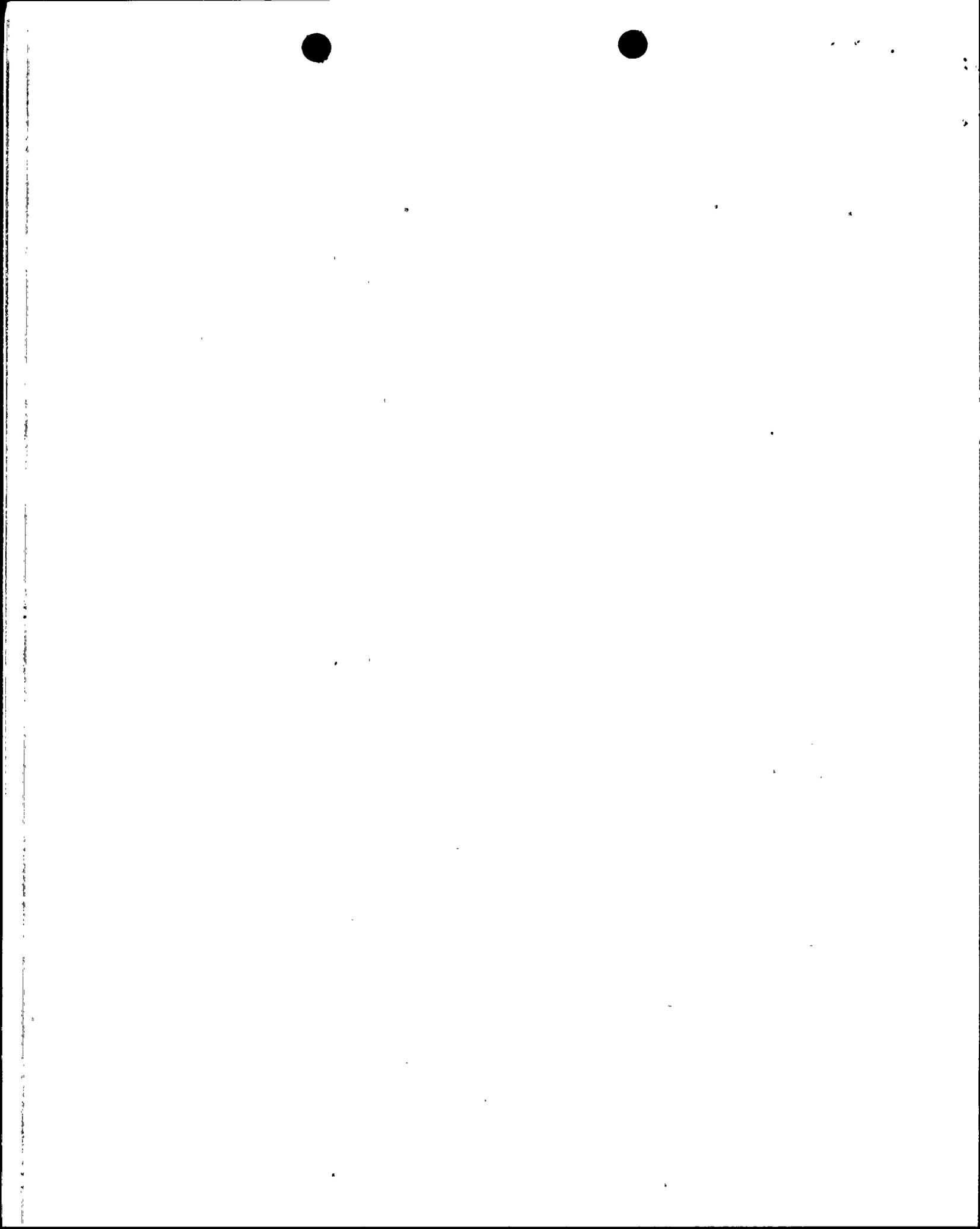
Region V reviewed your requests for a temporary waiver of compliance, dated March 13, 14, and 15, 1992. Technical Specification (TS) 3.5.2 Limiting Condition for Operation (LCO) action statement requires, while the plant is in Modes 1, 2, and 3 with one ECCS subsystem inoperable, restoration of the inoperable subsystem to operable status within 72 hours or be in at least hot standby within the next 6 hours and in hot shutdown within the following 6 hours. The TS LCO action statements for the remainder of the technical specifications noted in the requests require similar time restrictions for inoperable trains. Your submittals concluded that the extension of the TS LCO action statements from 72 hours to 93 hours, in order to facilitate diagnostic testing and corrective maintenance on train A of the ECWS heat exchanger, would not significantly affect plant safety.

Region V, with the concurrence of the Office of Nuclear Reactor Regulation, concluded that a temporary waiver of compliance of the TS 3.5.2, TS 3.6.2.1, TS 3.7.1.2, TS 3.7.3, and TS 3.7.11 LCO action statements to extend the maximum inoperable time limit to 93 hours, would not negatively impact public health and safety for the following reasons:

Interim measures were established to ensure that no interruption of offsite power to Unit 2 occurs while in these TS LCO action statements. All activity in the switchyard which could affect Unit 2 was suspended and no other work was performed or vehicular access allowed without the specific review and approval of the Vice President, Nuclear Production.

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Mr. William F. Conway

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March 16, 1992

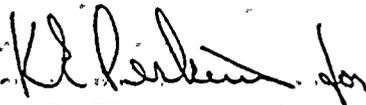
Based upon current seasonal conditions and compensatory measures which could be taken to restore normal heating, ventilation and air conditioning (HVAC) for the train A and B systems and components, the unavailability of essential cooling water and essential chilled water was not expected to result in the failure of train A components necessary for safely shutting down the plant.

Additional cooling paths were available to support the operation of the shutdown cooling system (SDCS). The train A SDCS pumps (i.e., LPSI and CS pumps) could be cross-connected to the train B SDCS to use the operable train B SDCS heat-exchanger. If neither train of the essential cooling water system (ECWS) was available for performing the shutdown cooling functions, the nuclear cooling water system (NCWS) could also be cross-connected to the desired ECWS train to provide a heat sink for shutdown cooling.

Based on the licensee's probability risk analysis, the increase in core damage probability associated with shutting down the plant (i.e., $2.9 \text{ E-}6$) was more than the increased risk associated with continuing the TS LCO action statement another 21 hours (i.e., $0.73 \text{ E-}6$).

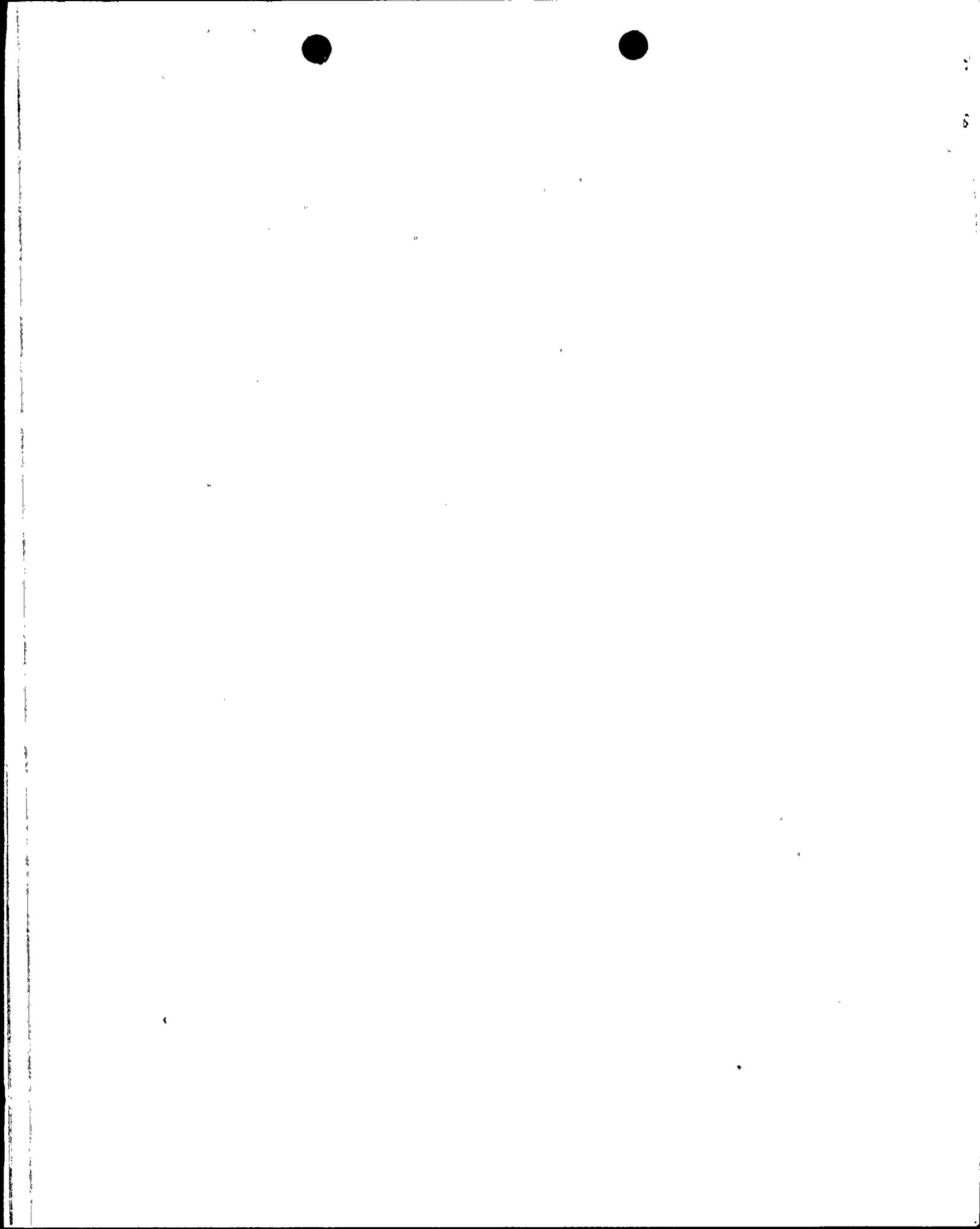
This waiver was granted to be in effect from 1525 MST on March 15, 1992 to 1225 MST on March 16, 1992. The licensee completed the work on train A of the ECWS and exited the TS LCO action statement at 1754 MST on March 15, 1992.

Sincerely,



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

cc: J. Taylor, EDO
T. Murley, NRR
J. Martin, RV
J. Lieberman, OE
J. Partlow, NRR
B. Boger, NRR
M. Virgilio, NRR
T. Quay, NRR
C. Trammell, NRR
K. Thompson, NRR
M. Boyle, NRR



- Based upon current seasonal conditions and compensatory measures which could be taken to restore normal heating, ventilation and air conditioning (HVAC) for the train A and B systems and components, the unavailability of essential cooling water and essential chilled water was not expected to result in the failure of train A components necessary for safely shutting down the plant.
- Additional cooling paths were available to support the operation of the shutdown cooling system (SDCS). The train A SDCS pumps (i.e., LPSI and CS pumps) could be cross-connected to the train B SDCS to use the operable train B SDCS heat exchanger. If neither train of the essential cooling water system (ECWS) was available for performing the shutdown cooling functions, the nuclear cooling water system (NCWS) could also be cross-connected to the desired ECWS train to provide a heat sink for shutdown cooling.
- Based on the licensee's probability risk analysis, the increase in core damage probability associated with shutting down the plant (i.e., 2.9 E-6) was more than the increased risk associated with continuing the TS LCO action statement another 21 hours (i.e., 0.73 E-6).

This waiver was granted to be in effect from 1525 MST on March 15, 1992 to 1225 MST on March 16, 1992. The licensee completed the work on train A of the ECWS and exited the TS LCO action statement at 1754 MST on March 15, 1992.

Sincerely,

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

- cc: J. Taylor, EDO
T. Murley, NRR
J. Martin, RV
J. Lieberman, OE
J. Partlow, NRR
M. Boyle, NRR
- B. Boger, NRR
M. Virgilio, NRR
T. Quay, NRR
C. Trammell, NRR
K. Thompson, NRR

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03/16/92

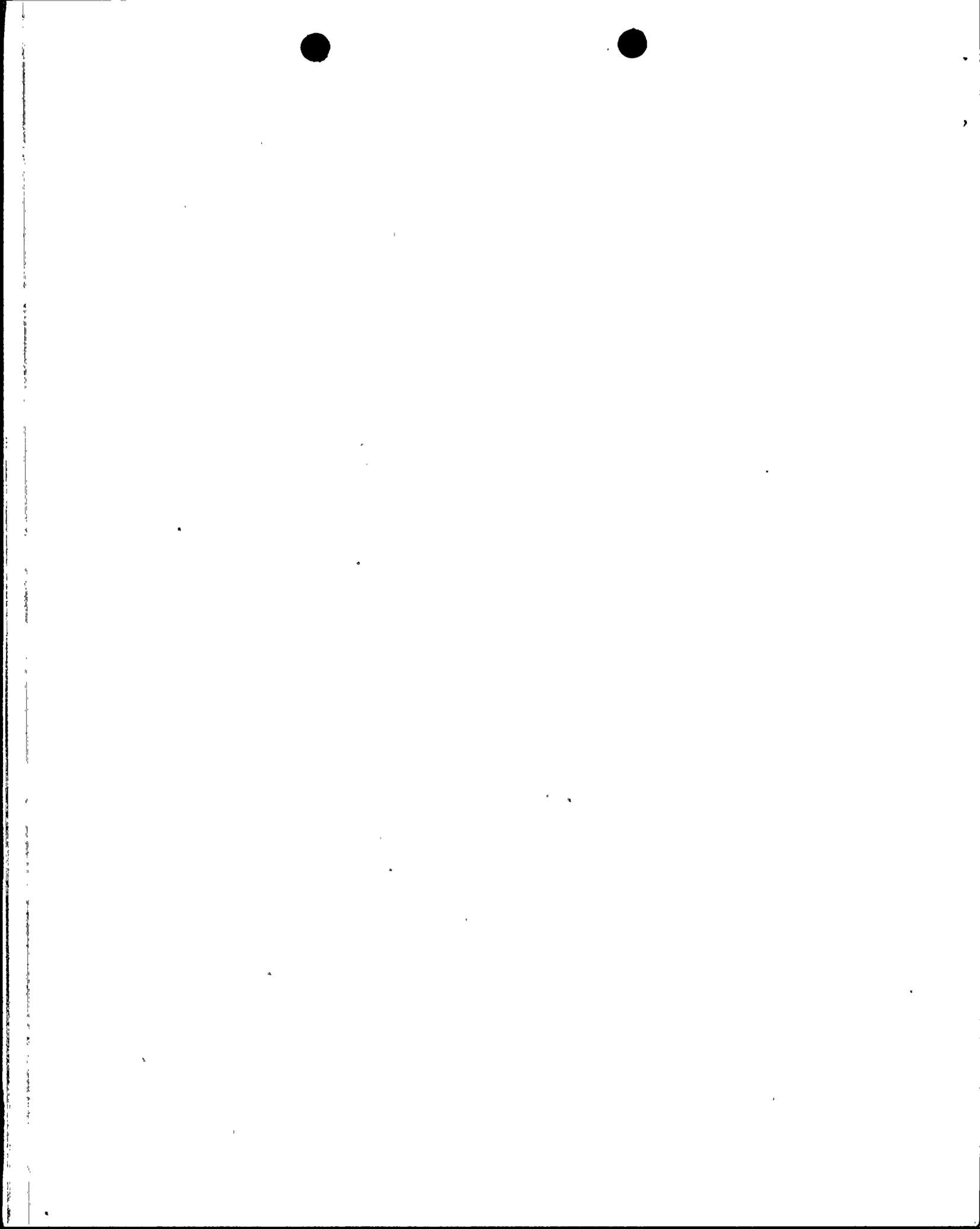
KP
KPerkins
03/16/92

RZ
RZimmerman
03/16/92

REQUEST COPY				
YES / NO				

SEND TO DCS	SEND TO PDR
YES / NO	YES / NO

* See previous concurrences



Mr. William F. Conway

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Based upon current seasonal conditions and compensatory measures which could be taken to restore heating, ventilation and air conditioning (HVAC) for the train A and B systems and components, the unavailability of essential cooling water and essential chilled water was not expected to result in the failure of train A components necessary for safely shutting down the plant.

Additional cooling paths were available to support the operation of the shutdown cooling system (SDCS). The train A SDCS pumps (i.e., LPSI and CS pumps) could be cross-connected to the train B SDCS to use the operable train B SDCS heat exchanger. If neither train of the essential cooling water system (ECWS) was available for performing the shutdown cooling functions, the nuclear cooling water system (NCWS) could also be cross-connected to the desired ECWS train to provide a heat sink for shutdown cooling.

Based on the licensee's probability risk analysis, the increase in core damage probability associated with shutting down the plant (i.e., 2.9 E-6) was more than the increased risk associated with continuing the TS LCO action statement another 21 hours (i.e., 0.73 E-6).

This waiver was granted to be in effect from 1525 MST on March 15, 1992 to 1225 MST on March 16, 1992. The licensee completed the work on train A of the ECWS and exited the TS LCO action statement at 1754 MST on March 15, 1992.

Sincerely,

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

cc:	J. Taylor, EDO	B. Boger, NRR
	T. Murley, NRR	M. Virgilio, NRR
	J. Martin, RV	T. Quay, NRR
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	J. Partlow, NRR	K. Thompson, NRR
	M. Boyle, NRR	

CVanDemburgh
03/16/92

SRichards
03/16/92

MVirgilio
03/ /92

KPerkins
03/ /92

RZimmerman
03/ /92

REQUEST COPY]				
(YES) / NO	(YES) / NO	YES / NO	YES / NO	YES / NO

[SEND TO DCS] SEND TO PDR]

[(YES) / NO] (YES) / NO]

