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WILLIAM L. STEWART EXECUTIVE VICE PRESIDENT NUCLEAR

102-03035-WLS/RAB/JNI July 12, 1994

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Mail Station P1-37 Washington, DC 20555

References: 1) Letter 102-02798-WFC/RAB/JNI dated January 25, 1994, from W. F. Conway, APS, to NRC, "Current Status of Station Blackout (SB0) Alternate AC Modifications"

- Letter dated April 14, 1993, from C. M. Trammell, NRC, to
 W. F. Conway, APS, "Station Blackout Final Supplemental Safety Evaluation - Palo Verde Nuclear Generating Station (TAC Nos. M68579, M68580, and M68581)"
- Letter 161-04146-WFC/MEP dated August 31, 1991, from
 W. F. Conway, APS, to NRC, "Revised Response to the Station Blackout Rule (10 CFR 50.63)"

Dear Sirs:

• •

Subject: Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2, and 3 Docket Nos. STN 50-528/529/530 Current Status of Station Blackout (SB0) Alternate AC Modifications File: 94-001-419; 94-056-026

As requested in Reference 2, Arizona Public Service Company (APS) is reporting the status of the Station Blackout (SBO) Alternate AC (AAC) standby gas turbine generators. Attachment 1 describes the PVNGS status.

During the NRC SBO Inspection (IR 94-201), conducted from February 28 through March 4, 1994, PVNGS clarified the AAC Reliability Program methodology to the NRC inspectors. Attachment 2 describes this clarification.

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 U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Current Status of SBO AAC Modifications Page 2

Should you have any questions, please contact Richard A. Bernier at (602) 393-5882.

Sincerely,

WLS/RAB/JNI/rv

Attachments:

- 1. SBO Modification Status
- 2. Clarification of SBO Reliability Program

CC:

L. J. Callan K. E. Perkins

K. E. Johnston

B. E. Holian

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ATTACHMENT 1

PVNGS

SBO MODIFICATION STATUS

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SBO MODIFICATION STATUS

Completion of Unit 3 Alternate AC Modifications:

As requested in Reference 2, Arizona Public Service Company (APS) is reporting that the installation and testing of the Station Blackout (SBO) Alternate AC (AAC) sources standby gas turbine generators have been completed, including the connection of these generators to the Unit 3 electrical bus. The connection to Unit 1 was reported in Reference 1. The Unit 2 modifications and testing will be completed during its next refueling outage, currently scheduled for April 1995.

APS will communicate the completion of Unit 2 Alternate AC modifications as requested by Reference 2.

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ATTACHMENT 2

PVNGS

CLARIFICATION OF SBO RELIABILITY PROGRAM

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CLARIFICATION OF SBO RELIABILITY PROGRAM

Discussion of AAC Reliability

The following discussion clarifies the methodology used to verify AAC reliability.

In the attachment to Reference 3, page 9, item 13, under Capacity and Reliability, APS stated: "The alternate AC power system, comprised of two standby Gas Turbine Generators, will meet or exceed a system reliability of 0.95 per demand as determined by NSAC-108."

In the attachment to Reference 3, page 26, item 21, APS indicated: PVNGS AAC will meet the requirements of NUMARC 87-00 section B.13(a) and RG 1.155 section 3.3.5.5.

NUMARC 87-00, Revision 1, page B4, section B.13(a), Systems Not Normally Operated (Standby Systems), states: "System reliability should be maintained at or above .95 per demand, as determined in accordance with NSAC-108 methodology (or equivalent)."

RG 1.155, August 1988, section 3.3.5.5 states: "The reliability of the AAC power system should meet or exceed 95 percent as determined in accordance with NSAC-108 or equivalent methodology."

APS uses an equivalent methodology. The methodology utilizes samples of GTG test and operating data and compares this data with predetermined values (trigger values) to determine a proper course of action to support GTG reliability goals. This methodology consists of four parts:

- 1. Maintaining data on successful and failed GTG demands.
- 2. Evaluating the reliability indicators for the last 20, 26, 33, and 39 demands.
- 3. Relating the calculated GTG reliability indicators to trigger values established for the selected target reliability.
- 4. Taking remedial actions for individual failures exceeding one or more trigger values.

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• During the NRC SBO Inspection (IR 94-201), conducted from February 28 through March 4, 1994, PVNGS clarified the AAC Reliability Program methodology to the NRC inspectors. The NRC issued Inspection Report 50-528/94-201, 50-529/94-201, and 50-530/94-201, Palo Verde Nuclear Generating Station, Units 1, 2, and 3, Station Blackout Inspection, dated April 13, 1994. Quoting from Section 4.3.2 Alternate AC Source, page 8 of the report: "The team concluded that the gas turbine generator system reliability program was similar to the EDG reliability program, included trigger values, and was adequate." Б d

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