



Arizona Public Service Company
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WILLIAM L STEWART
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-03185-WLS/AKK/DLK
November 21, 1994

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

Reference: Letter 102-03091, dated August 23, 1994, W. L. Stewart, APS, to U. S. Nuclear Regulatory Commission, Document Control Desk, "Reply to Notice of Violations 50-528/529/530/94-12-01, 50-530/94-12-03, 50-530/94-12-04, and 50-528/529/530/94-12-05"

Dear Mr. Gwynn:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Revised Commitment Completion Date and Date of Full Compliance for
Notice of Violation (NOV) 50-528/529/530/94-12-05
File: 94-070-026**

On August 23, 1994, Arizona Public Service Company (APS) provided the referenced letter in response to NOV 50-528/529/530/94-12-05. In the sections titled "Corrective Actions That Will Be Taken To Avoid Further Violations" and "Date When Full Compliance Will Be Achieved" (on pages 17 and 18) APS committed to revise the 10 CFR 50.59 evaluations for the auxiliary feedwater pump steam admission valves (SGA-UV0134 and SGA-UV0138) and achieve full compliance by September 13, 1994. Prior to September 13, 1994, APS recognized that the committed-to date would not be met. On September 10, 1994, APS telephoned Mr. Bradley Olson of the Region IV Walnut Creek Field Office to inform the NRC that the commitment date would not be met. APS agreed to provide this followup letter revising the corrective action completion date and the date of full compliance. The 10 CFR 50.59 discussed above will be revised and full compliance will be achieved by November 30, 1994.

The revision to the original 10 CFR 50.59 was delayed when a separate but related safety evaluation discovered a problem with an emergency operating procedure that depressurized the secondary on a Large Break Loss Of Coolant Accident (LOCA). No data or analysis was available that addressed the off-site dose impact of any radioactive release from the secondary side due to a fuel failure with the primary (which in the case of a LOCA would include the containment building) being at a potentially higher pressure than the secondary. This scenario needed to be evaluated prior to completing the

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revision to the 10 CFR 50.59 associated with auxiliary feedwater pump steam admission valves.

Should you have any questions, please contact Angela Krainik at (602) 393-5421.

Sincerely,

A handwritten signature in black ink, appearing to read "WLS" followed by a stylized flourish or surname.

WLS/AKK/DLK/pv

cc: L. J. Callan
K. E. Perkins
B. E. Holian
K. E. Johnston



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