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			Ŭ			20.4	405(	a)(1)	(iii)			ł	X		50.73	3(2)(2)(	D				$\vdash$		50.1	73(a)(	2)(vi	i)(A)				⊢		bek	w and	s in To	nd, N	RC F	om
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ACILITY	NAME			DOCKET NUMBER		LE	R NUMBE	R		F	PAG	<u> </u>
	Palo	Verde Unit 1		1	YEAR		SEQUENTIAL NUMBER		REVISIO NUMBER			
	-			0 5 0 0 0 5 2 8	9 5	-	0 0 4	-	0 0	0 2	of	0
EXT	1.	REPORTING RE	QUIREMENT:									
		This LER 528 conditions t condition th specified in prohibited b specified in	/529/530/9 hat result at was out 10 CFR 50 by the plan 10 CFR 50	5-004 is being w ed in the nuclea side the design .73(a)(2)(ii)(B) t's Technical Sp .73(a)(2)(i)(B).	ritto r pla basis and ecif:	en ant s c a ica	to re bein of the condi tions	po g ti a	rt in a lant on s	as		
		Specifically were in MODE percent, 9 p as a result Public Servi that redunda thirty-four circuits in and two).	, on March 1 (POWER) ercent, and of a calcu ce Company nt overcur: (34) elect each of Un	29, 1995, Palo OPERATION) opera d 100 percent po lation reverific (APS) Engineeri rent protection rical containmen its 1, 2, and 3	Verde ting wer ation ng po was t t (NI (a to	e U res n e ers not H) ota	inits appr pecti ffort onnel prov penet	1, ve d id ra on	2, imat ly, Ariz eter eter eter tion e hu	and ely when ona mine n (PE ndre	3 85 d N) d	
		The design b (PVNGS) requ circuits out credited for where calcul rating of th Engineering' outside the	asis for Pa ires two (2 side the co containmen ated maximu e penetrat s findings design bas	alo Verde Nuclea 2) protective de ontainment penet nt penetration f um fault current ion feedthrough. , Units 1, 2, an is of the plant.	r Gen vices ratio eedth exco As d 3 v	ner s. o on hro eed a wer	ating on the speci ough p s the resul resul	fi fi t a	tatic call tect herm of A cond	on rica y ion al PS itio	1 n	
		At approxima determined t penetration compliance w (Applicabili	tely 1400 h hat the th overcurrent ith plant t ty Modes 1	MST, on March 29 irty-four (34) a t protective dev Iechnical Specif through 4), whi	, 199 ffect ices icat: ch st	95, ted we ion tat	APS cont re no (TS) es in	Mai ai t 3 p	nage nmen in .8.4 art:	ment t .1		
		"Primar overcur contain OPERABI those c not exc	y and back rent prote- ment elect: E. The sca ircuits for seed the elect	up containment p ctive devices as rical penetratio ope of these pro r which credible ectrical penetra	enet socia n cin tect fau tion	rat ate rcu ive lt de	ion c d wit it sh devi curre sign	on al ce nt ra	duct each l be s ex s wo ting	or clud uld	es	
		With on penetra inopera	e or more ( tion conduc ble:	of the above req ctor overcurrent	uire prot	d c tec	ontai tive	nm de	ent vice	s		
		a. Re or as	store the p deenergiz	protective devic e the circuit(s) ackup circuit br	e(s) by f eake:	to tri r o	OPER pping or rac	AB t ki	LE s he ng o	tatu ut o	s r	

·		LICENSEE EVENT REPORT (LER) TEXT CONTINUATION
FACILITY I	Palo	/erde Unit 1
TEXT		declare the affected system or component inoperable and verify the backup circuit breaker racked out at least once per 7 days thereafter"
, ,		Units 1, 2, and 3 Operations personnel (utility, licensed) declared the thirty-four (34) affected containment penetration overcurrent protective devices inoperable and entered the 72 hour action statement for TS Limiting Condition for Operation (LCO) 3.8.4.1 Action (a). This 72 hour action statement expired on April 1, 1995, at 1400 MST.
ŀ	2.	EVENT DESCRIPTION:
		On March 10, 1995, APS Engineering personnel identified that during the initial design of PVNGS, the penetration protection calculations (13-EC-PK-160 and 13-EC-PH-240) were performed using non-conservative assumptions. The problems with the calculations were found during a calculation reverification review.
		The following problems were found with calculation 13-EC-PK-160:
		a. The worst-case short circuit was postulated as a hot-to- neutral fault across the containment penetration. The calculated maximum current was below the penetration conductor long-time rating, thus alleviating the need to credit two protective devices. However, while performing a calculation reverification, APS Engineering discovered that a hot-to-ground fault (which is equally credible) results in a fault current that exceeds the penetration conductor long-time rating. As a result, fifteen (15) electrical circuits, previously designed with only one protective device, now require two protective devices.
		b. Seven (7) circuits requiring redundant overcurrent protective devices were not analyzed or included in the original calculation.
		The following problems were found with calculation 13-EC-PH-240:
		a. Six (6) electrical circuits contained 125 volt DC circuit breakers (72) upstream of their respective inverters (INVT) which were credited as one of the required protection devices. The other protective devices were 480 volt AC circuit breakers (52) located downstream of their respective inverters. The correlation of current through an AC circuit breaker is not linear to that

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REPORT (LER) TEXT	CONTINUATION	
DOCKET NUMBER		PAGE
	YEAR SECONDUC REVISIO	
ry to coordinate included in the	AC and DC circuit original calculat:	ion.
culation contained downstream of vo e current limitat he impedance of t uit current to a uctor long-time n owever, consider t of both the vol downstream cable t of both the vol downstream cable t downstream cable for a current limit ors, are above the h, redundant over ted with penetrat red. nnel, upon discove, initiated an in PS Corrective Act on suggested that ient information il just prior to	a six (6) 120 volt oltage regulators ( tion effect of the the downstream cabl level below the rating. As a resul protective devices ing the current tage regulator and es concurrently is d short circuit leve imiting effect of the penetration long- rcurrent protective tion feedthrough da very of the errors nvestigation in tion Program. While t a number of circuit on the specific co	I AC (90) Les to It, were I the not a vels, the -time amage in the le nits ircuits cision
MST on March 29, containment pene the Emergency Not 2(b)(1)(ii)(B).	, 1995, APS Manager etrations inoperabl tification System	nent Le, APS
to shut down on A outage. As a res on to extend the A 0 MST, April 4, 1 eam Generator (Al or to cooling down on was verbally gr 1 remained in th 4.1 until at 1008 eved, and TS 3.8.4 ty-four (34) cont re devices will be crent (fifth) refu	April 1, 1995, in o sult, APS requested Allowed Outage Time 1995, in order to a B) high temperature wn to MODE 5 (COLD ranted by the NRC o he extended action B MST on April 3, 1 4.1 was no longer tainment penetration e returned to OPER ueling outage (1R5)	order d e (AOT) allow e on 1995, on ABLE ),
	REPORT (LER) TEXT DOCKET NUMBER 0 5 0 0 5 2 8 cuit breaker. The ry to coordinate included in the culation contained downstream of vol- e current limitate he impedance of a uit current to a uctor long-time for -up overcurrent powever, consider t of both the vol- downstream cable. The reverified 1 load current 12 rs, are above the h, redundant over ted with penetrate red. nnel, upon discove , initiated an in PS Corrective Act on suggested that ient information il just prior to MST on March 29 containment pene the Emergency Not 2 (b) (1) (ii) (B). to shut down on a outage. As a resonned the a 0 MST, April 4, a eam Generator (Allow or to cooling down was verbally grident 1 remained in the 4.1 until at 1000 ved, and TS 3.8.4 ty-four (34) conte rent (fifth) refy SHUTDOWN) entry.	REPORT (LER) TEXT CONTINUATION DOCKET NUMBER VEAR VAR VEAR VAR VEA

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	LICEN	SEE EVENT K	EPORT (LER) TEXT	CONTINUATION
FACILITY NAME			DOCKET NUMBER	YEAR SEQUENCL REVISIO
P	alo Verde Unit 1			
			0 5 0 0 0 5 2 8	9 5 - 0 0 4 - 0 0 0 5 of 0
	In Units 2 containment for safe pl deenergized 1995, at 20 complied wi Action (a). comply with specified T date, and a implemented for normal returned to basis. On March 30 Enforcement discussed e (Applicabil states in p	and 3, fine penetratic ant operatic without af 48 MST and th the 72 h The affec the PVNGS S AOT or le n additiona to verify power opera a configur , 1995, APS (NOED) - o arlier) and ity Modes 1 art:	(9) of the thin on circuits were ons. The remain fecting power of 1706 MST, respec- our action state ted circuits were design requirement of deenergized to l seven (7) day that the affected tion remain deen ation in complia requested two M ne for TS 3.8.4. the other for T through 4) in U	required to be energized ning circuits could be peration. On March 31, ctively, Units 2 and 3 ement for TS LCO 3.8.4.1 re either modified to ents within their to be modified at a later surveillance was ed circuits not required nergized until they are ance with the design Notices of Discretionary .1 in Unit 1 (as IS LCO 3.6.3 Action (1) Units 2 and 3 which
	"With mainta affect	one or mor in at leas ed penetrat	e of the isolat t one isolation ion that is oper	ion valve(s) inoperable, valve OPERABLE in each n and either:
	a.	Restore the within 4 ho	e inoperable val ours, or	ve(s) to OPERABLE status
•	b.	Be in at le and in COLE hours."	east HOT STANDBY SHUTDOWN within	within the next 6 hours n the following 30
	The NOED fo extend the redundant p Cooling Wat 12 hour ext unnecessary by the NRC modificatio statement f	or TS 3.6.3. AOT for an protective d er (CC) con ension was plant tran on March 31 ons were com for TS LCO 3	1 was requested additional 12 ho evice on the cin tainment isolat a precautionary sient. The NOEN , 1995, but was pleted within th .6.3 Action (1.4	for Units 2 and 3 to ours to add the required rcuit for a Nuclear ion valve (ISV). The measure to preclude an D was verbally approved not needed. The he 4 hour action a).

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Palo	o Verde Unit 1		YEAR	SEQUENTIAL NUMBER	REVISIO NUMBER		
		0 5 0 0 0 5 2 8	95-	0 0 4	- 0 0	0 6	C
3.	ASSESSMENT OF THE SAFE EVENT:	TY CONSEQUENCES	AND IM	IPLICAT:	ION OF	' THI	S
	The OPERABILITY of the overcurrent protective through a containment damage curve. This de delivering short-circu which could cause ther	e containment pen e devices ensures penetration feed sign feature pre it currents of a mal damage to th	etrati that throug vents magni e pene	on cond the fau h is le the cin tude an etration	luctor ilt cu ess th ccuits nd dur ns.	arren an i fro atio	tt n
	The primary protective affected circuits were safety function. Only containment protective	e devices install OPERABLE and ca the added assur devices was in	ed on pable ance c questi	the th: of period of the p on.	irty-f formin redund	our g th ant	( e
	This event did not res product barriers or re materials. There were implications as a resu adversely affect the s and safety of the publ	ault in any chall sult in any rele no adverse safe lt of this event afe operation of ic.	enges ases c ty con . Thi the p	to the of radio sequence s event blant of	fissi bactiv ces or did the	on e not heal	t
4.	CAUSE OF THE EVENT:						
	An investigation is be Action Program. The i cause of the event was original Architect Eng were transferred from their adequacy and com decision to perform on reliance on the expert conducting design acti Appendix B, Quality As	ing performed un nvestigation to a design error ineer (A/E). Wh the A/E to APS, pleteness was pe ly minimal revie ise provided by vities under the surance Program.	der th date d on the en the only m rforme ws was the A/ E A/E's	e APS ( letermine e part ( e design inimal ed by And based (E, who s 10CFR!	Correct ned th of the n docu revie S. T on AP was 50,	tive at t ment w of he S'	b
	In 1989, APS discovere had not been updated t during construction, s addition, many of thes explain the assumption designers. In 1990, A Reverification Program discrepancies. The fi resulted in the discov deficient design condi corrective actions to design configuration ( Manufacturing. or Inst	d that many of t o include the ad tart-up, and com se calculations d as or rationale u PS initiated the to address and ndings of this o very by APS perso tions and the in restore the plan SALP Cause Code	he ori dition mercia id not sed by calcu resolv ongoing onnel c itiati ts to B: Des	ginal of s and of al opera- t adequa the of alation ve these of similation of similation	calcul change ation. ately rigina t have t have Lar requir approv	atio s ma In l red red	nd

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	Palo	Verde Unit 1				NUMBER		NUMBER			
			0 5 0 0 0 5 2 8	9 5	- 0	04	_	0 0	0 7	of	0   8
TEXT		No unusual characteris heat, poor lighting) d There were no procedur event.	tics of the work irectly contribu al errors which	loc ted cont	atio to rib	on (e this uted	e.g ev to	., n ent. thi	oise s	27	
	5.	STRUCTURES, SYSTEMS, O	R COMPONENTS INF	ORMA	TIO	N :					
		As discussed in Section containment penetration declared inoperable at indications that other inoperable at the star event. No components There were no component therefore, no safety s were no safety system	on 1, the thirty- on overcurrent pr the start of th structures, sys t of the event t with multiple fu t or system fail ystems were rend actuations and n	four otec e ev tems hat ncti ures ered one	(3) ent cont ons in wer	4) af e dev . Th r con tribu were volve opera e req	ferica ipo ite ite ite ite ite ite ite ite ite ite	cted es w nent d to nvol e. reû.	ere e no s we the ved. Ther	re	
	6.	CORRECTIVE ACTIONS TO	PREVENT RECURREN	CE:							
		On March 31, 1995, tem in Units 2 and 3 to br needed for normal powe design basis. The rem required for power ope deenergized and are be modifications or analy temporary procedure ha day surveillance to ve required for normal po they are returned to a design basis. In Unit circuits are expected September 30, 1995.	porary modificat ing the nine (9) ir operation back aining affected tration) in Units tically justifie s been developed arify that the aff over operation re configuration i s 2 and 3, the t to be returned t	ions ele in circ 2 a ng p d. to fect main n co hirt o se	hay ctr: comj uit: erma An a per: ed o dec mpl: y-fo rvio	ve be ical plian s (th 3 hav anent form circu energ iance our ( ce by	en ce ce ce ce ce ce ce ce ce ce ce ce ce	ins rcui e no been esig d seve s no ed u ith ) af	tall ts h th t n (7 t ntil the fect	ed e )	
		Five (5) of the origin have been subsequently and found to be config are needed. Component credited as a protecti Protection calculation circuits are in compli	al thirty-four ( re-evaluated by ured such that n s in the existin ve device or the could analytica ance with the de	34) APS o ha g ci Ele lly sign	affe De: rdw: rcu: ctr: jus: ba:	ected sign are m its c ical tify sis.	l C En od ou Pe th	ircu gine ific ld b netr at t	its erin atic e atic he	g ons on	
		The affected circuits permanent modification returning to MODE 4 fo outage (1R5). Unit 1 May 16, 1995.	in Unit 1 will k s or analyticall llowing the curr is expected to c	e co y ju ent compl	rre sti (fi ete	cted fied fth) 1R5	us pr re by	ing ior fuel	to ing		

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<ul> <li>Palo Verde Unit 1</li> <li>0 5 0 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 6 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 6 5 2 8 9 5 5 - 0 0 4 - 0 0 0 8 of 0 5 0 0 6 5 2 8 9 5 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 5 0 6 5 2 8 9 5 - 0 0 4 - 0 0 0 8 of 0 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6</li></ul>			D	OCKET N	JMBER	YEAF		ER NUM	BER	REVISIO		PAG
<ul> <li>0 5 0 0 0!5 2 8 9 5 - 0 0 4 - 0 0 0 8 of the Calculation Reverification Program will continue to review design calculations. The intent of the program is to confirm adequacy and compliance of the plant design to the plant design to the plant design basis. Future findings will be addressed in accordance with the APS Corrective Action Program.</li> <li>7. PREVIOUS SIMILAR EVENTS:</li> <li>There have been no previous similar events reported pursuant to 10CFR50.73 in the last three years specific to containment penetration overcurrent protective devices. However, findings from the ongoing Calculation Reverification Program has result in previously submitted LERs such as LERS 528/93-011-00 and it supplement 528/93-011-01, dated December 25, 1993, and February 6, 1995, respectively. The condition identified in these LERs indicated that it may be possible to have substandar voltages on the Class 1E 480V power system. Previous correctivation pre-existed the previous corrective actions.</li> </ul>	Palo	o Verde Unit 1					-		-	NOMBE	-	,
<ul> <li>The Calculation Reverification Program will continue to review design calculations. The intent of the program is to confirm adequacy and compliance of the plant design to the plant design basis. Future findings will be addressed in accordance with the APS Corrective Action Program.</li> <li>7. PREVIOUS SIMILAR EVENTS:</li> <li>There have been no previous similar events reported pursuant to 10CFR50.73 in the last three years specific to containment penetration overcurrent protective devices. However, findings from the ongoing Calculation Reverification Program has result in previously submitted LERs such as LERs 528/93-011-00 and it supplement 528/93-011-01, dated December 25, 1993, and February 6, 1995, respectively. The condition identified in these LERs indicated that it may be possible to have substandar voltages on the Class 1E 480V power system. Previous correctiactions could not have prevented this event because the condition pre-existed the previous corrective actions.</li> </ul>	· · · · · · · · · · · · · · · · · · ·		0 5	0 0 0	52	8 9 5	-	0 0	4 -	0 0	0 8	of
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