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SUBJECT: Responds to RAI related to risk-informed IST pilot program.

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MAH

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Palo Verde Nuclear Generating Station

William E. Ide
Vice President
Nuclear Engineering

TEL 602/393-6116
FAX 602/393-6077

Mail Station 7605
P.O. Box 52034
Phoenix, AZ 85072-2034

102-03987 - WEI/AKK/RKB
August 1, 1997

U.S. Nuclear Regulatory Commission
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References:
1. Letter No. 102-03554, dated November 27, 1995, from W. L. Stewart, APS to USNRC.
2. Letter No. 102-03573, dated December 20, 1995, from W. L. Stewart, APS to USNRC.
3. Letter dated March 15, 1996, from C. R. Thomas, USNRC to W. L. Stewart, APS.
4. Letter No. 102-03714, dated June 7, 1996, from J. A. Bailey, APS to USNRC.
5. Letter No. 102-03752, dated August 7, 1996, from W. L. Stewart, APS to USNRC.
6. Letter No. 102-03763, dated August 23, 1996, from A. K. Krainik, APS to USNRC.
7. Letter dated March 21, 1997, from J. W. Clifford, USNRC, to W. L. Stewart, APS.
8. Letter dated June 9, 1997, from J. W. Clifford, USNRC, to J. M. Levine, APS.

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Dear Sirs:

Subject: **Palo Verde Nuclear Generating Station (PVNGS)**
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Response to Request for Additional Information Related To Risk-Informed Inservice Testing Pilot Program

A047

Arizona Public Service Company (APS) submitted a request (references 1 and 2) to the United States Nuclear Regulatory Commission (NRC) as part of a pilot plant effort related to risk-informed inservice testing (RI-IST). In reference 3, the NRC staff

provided an initial request for additional information (RAI) to APS related to the RI-IST pilot program. A partial response to the initial RAI was provided by APS to the NRC staff via reference 4. In reference 5, APS committed to provide the NRC staff with a revised schedule for fully responding to the initial RAI by September 15, 1996. APS submitted additional information to the NRC staff related to the initial RAI in reference 6. A second RAI was provided to APS by the NRC staff via reference 7. In addition, the NRC staff and the pilot plants have held technical meetings on several occasions. All of these activities have been in support of the development of a process for implementation of RI-IST. On June 23, 1997, draft Regulatory Guides and Standard Review Plan sections were issued for public comment. In reference 8, the NRC staff provided APS with advanced copies of the draft Regulatory Guides and Standard Review Plan sections along with a third RAI to provide comment on the draft documents and describe how APS' program comports to draft Regulatory Guides DG-1061, "General Guidance" and DG-1062, "IST." The staff asked for a response to this RAI or a plan and schedule for providing a complete response to the NRC within 45 days of receipt of this request.

Through the positive exchange which has developed with the NRC staff, it is believed that the development of the RI-IST methodology has made significant gains. The development of the RI-IST methodology, however, involved more work than was initially anticipated. While APS has up to now been focusing its resources on RI-IST, various other activities (e.g., the 10 year IST program update and improved technical specification implementation) now require the resources of Palo Verde IST personnel. Unfortunately, the necessary resources must be diverted for a time from the implementation of RI-IST in order to complete these other activities with a high level of quality. Once these activities have been completed, APS will resume implementation of RI-IST.

In addition, APS has learned through its work in the RI-IST pilot program that although the Probabilistic Risk Assessment (PRA) model in use at Palo Verde is a high quality model, the software for solving the model is not agile enough for daily use in a production environment. A typical solution of the PRA model takes approximately 100 hours. This response time is unacceptable for daily configuration risk management. For this reason, APS has chosen to replace its PRA software, the conversion of which will not be completed until mid-1998. Since the software needed for implementation of RI-IST is not currently operational at Palo Verde, limited value can be achieved in comparing APS' current program to the requested draft Regulatory Guides.

Therefore, due to the resource constraints and operational priorities discussed above, APS will not be in a position to resume supporting the RI-IST implementation effort until mid-1998. At that time, APS will provide the NRC staff with a schedule for responding to the third RAI (reference 8). APS believes that providing the NRC staff with a program comparison against draft Regulatory Guides DG-1061 and DG-1062 will adequately address the questions presented in the first and second RAIs (references 3 and 6), and thus APS does not intend to provide any further specific correspondence regarding those RAIs. APS would appreciate feedback from the NRC staff if this approach to responding to the series of RI-IST RAIs is not acceptable.

APS will continue to support the development of RI-IST methodology by providing review and comments on the Regulatory Guides and SRPs by the end of the 90 day period allowed for public comment, as well as through continued involvement with the ASME task group for component importance ranking. APS has learned a great deal about risk informed applications as part of the pilot program and, believe this has contributed constructively to the integrated risk management process.

Should you have any questions, please contact Scott A. Bauer at (602) 393-5978.

Sincerely,

WEI/AKK/RKB/mah

cc: E. W. Merschoff
K. E. Perkins
K. M. Thomas
PVNGS Sr. Resident
R. H. Wessman