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Arizona Public Service Company

PALO VERDE NUCLEAR GENERATING STATION P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

> 102-04071 – JML/AKK/DGM/RAS January 31, 1998

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

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2, & 3 Docket Nos. STN 50-528/529/530 Periodic Report of Commitment Changes

In accordance with NRC SECY-95-300, December 20, 1995, and NEI "Guideline for Managing NRC Commitments," Revision 2, December 19, 1995, Arizona Public Service Company is submitting the enclosed report which details changes to commitments which require NRC notification. This report is a compilation of the commitment changes requiring NRC notification which have been completed through December 1997 at PVNGS Units 1, 2, & 3.

The enclosed report contains a brief description of the original commitments, the commitment changes, and a brief justification for each action. APS uses a Commitment Action Tracking System to manage and track commitments made to external regulatory agencies. Complete documentation of the commitment change evaluations is available at PVNGS for NRC review.

If you have guestions regarding this submittal, please contact Daniel G. Marks at (602) 393-6492.

9802130109 98013

(all w/enclosure)

JML/AKK/DGM/RAS/rlh

Enclosure

cc: E. W. Merschoff J. W. Clifford J. H. Moorman K. E. Perkins Sincerely,

Angela K. Krainik Department Leader Nuclear Regulatory Affairs

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ENCLOSURE

PALO VERDE NUCLEAR GENERATING STATION PERIODIC REPORT OF COMMITMENT CHANGES

Original Commitment:

[PVNGS will] "enter the Action Statements for Technical Specification 3.4.7 whenever the specific activity of the primary coolant exceeds 12 μ Ci/gm dose equivalent I-131 or exceeds 0.6 μ Ci/gm dose equivalent I-131 for more than 48 hours during one continuous time interval." This commitment is associated with the main steam line break-induced multiple steam generator tube rupture (MSLB-MSGTR) assessment performed to support unit restart.

(Commitment Source Document: APS letter nos. 102-02585, dated 7/25/93, and 102-02599, dated 8/5/93).

Commitment Change:

PVNGS no longer maintains the licensing basis commitment to "enter the Action Statements for Technical Specification 3.4.7 whenever the specific activity of the primary coolant exceeds 12 μ Ci/gm dose equivalent I-131 or exceeds 0.6 μ Ci/gm dose equivalent I-131 for more than 48 hours during one continuous time interval."

Commitment Change Justification:

The NRC credited the MSLB-MSGTR assessment and I-131 administrative limits in their safety evaluation, dated 8/19/93, which allowed the restart of Unit 2 after the SG tube rupture. This credit for an assessment of an accident outside of the design basis was necessary because there was uncertainty in the ability to estimate the structural integrity of the SG tubes at the end of the proposed operating period. In the years since, however, the SG tube inspection processes have been improved such that PVNGS now has a high level of confidence that the SG tubes will retain adequate structural and leakage integrity during normal, transient, and postulated accident conditions during the period of operation between SG tube inspections. Therefore, the compensatory measures invoked by this commitment are no longer necessary.

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Original Commitment:

"Work Requests have been initiated to re-orient all applicable SMC-04 operators to a horizontal position. This action will be completed in all three units no later than the end of Unit 3's sixth refueling outage, which is scheduled to end May 07, 1997."

(Commitment Source Document: LER 50-528/95-016-00, APS letter no. 192-00961-JML/BAG/RAS, dated 2/22/96)

Commitment Change:

Some SMC-04 motor operators were not re-oriented as committed in LER 50-528/95-016-00.

Commitment Change Justification:

This commitment appeared as a corrective action in an LER that reported the failure of a Unit 1 Containment Spray pump mini-recirculation isolation valve (1JSIBUV665) to stroke closed during surveillance testing (ST). Subsequent investigation revealed that two conditions had occurred which caused the valve to fail. First, material had been milled from the valve operator's stator during rework activities which left excess clearance between the stator and motor housing. Second, the stator shield set screw was tightened which misaligned the stator and bound the motor.

One of the LER corrective actions for the event was to initiate Work Requests to have the potentially affected SMC-04 operators re-oriented to a horizontal position. This action was to be completed in all three units by May 7, 1997. Subsequent to the submittal of the LER, Valve Services personnel determined that some of the applicable SMC-04 actuators were going to be replaced with larger actuators which did not need to be reoriented.

Although the actuator re-orientation was identified as a corrective action, the position of the actuator did not directly contribute to the motor failure. However, if the motor is in the horizontal position, the affect of the stator shield failing to hold the stator in place is reduced, and as such, was considered an enhancement to the existing configuration. Since the affected SMC-04 actuators have either been re-oriented or are going to be replaced with actuators that are not affected by this event, this action does not need to be maintained as an active commitment.

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Original Commitment:

"Mandatory QC inspection hold points will be required to verify relay cleanliness after completion of work activities in the relay cabinets."

(Commitment Source Document: Response to NOV 86-23-01, APS letter no.: ANPP-38117-EEVB/TDS-96.03, dated 9/5/86)

Commitment Change:

PVNGS no longer maintains the licensing basis commitment to perform mandatory QC inspection hold points to verify relay cleanliness after completion of work activities in the relay cabinets.

Commitment Change Justification:

The subject commitment was made in response to NRC Notice of Violation (NOV) 50/528/86-23-01 which documented the identification of foreign materials located in and on Class 1E Auxiliary Relay Cabinets. A similar incident had previously been described to the NRC in Deficiency Evaluation Report (DER) number 85-22. As part of the corrective actions to the NOV, PVNGS committed to mandatory Quality Control inspection hold points to verify relay cleanliness after completion of work activities in relay cabinets.

Nuclear Assurance performed a review of work records and it was revealed that in excess of 200 inspections of Auxiliary Relay Cabinets were performed with no deficiencies being identified. Based on the high acceptance rate, Nuclear Assurance re-allocated these inspection resources to other areas.

Maintenance personnel now perform verifications of cleanliness following completion of work activities in relay cabinets. Nuclear Assurance periodically observes and evaluates the adequacy of these maintenance verifications in conjunction with ongoing oversight activities.

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Original Commitment:

"A procedure change will be implemented for all three units to ensure that the reactor coolant pump speed sensors are checked for grounds and the speed sensor circuits are at nominal values each refueling outage."

(Commitment Source Document: LER 50-529/89-010-00, APS letter no.: 192-00554-JML/TDS/RKR, dated 11/30/89)

Commitment Change:

PVNGS no longer maintains the commitment that required the reactor coolant pump speed sensors be checked for grounds and the speed sensor circuits are at nominal values each refueling outage.

Commitment Change Justification:

This commitment was made as a result of failures of the RCP speed sensing system that contributed to a Unit Two plant trip on 10/31/89. The LER associated with the plant trip, LER 89-010, committed to enhanced testing of the speed sensing system. The original commitment required that the RCP speed sensors be checked for grounds and nominal operation. The speed probes and connectors that caused the failures were subsequently replaced with probes and connectors of a new design. The new design eliminates the repeated problems of the previous design and the need for the specified testing.

APS performs surveillance testing of the new speed sensors in accordance with PVNGS Technical Specifications and manufacturer's recommendations.

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