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PUBLIC SERVICE COMPANY

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P.O. BOX 21666 - PHOENIX, ARIZONA 85036

PT 12:50

August 30, 1982  
ANPP-21722-GHD/BSK

U. S. Nuclear Regulatory Commission  
Region V  
Creskide Oaks Office Park  
1450 Maria Lane - Suite 210  
Walnut Creek, California 94596-5368

Attention: Mr. T. W. Bishop, Chief  
Reactor Construction Projects Branch

Subject: Interim Report - DER 82-39  
A 50.55(e) Potentially Reportable Deficiency Relating  
To C.E. Valve Limit Switches (Class IE) May Be Below  
Maximum LOCA Flood Level In Containment

File: 82-019-026; D.4.33.2

Reference: Telephone Conversation between G. Hernandez and G. Duckworth  
on July 30, 1982

Dear Sir:

The NRC was notified of a potentially reportable deficiency in the  
referenced telephone conversation. At that time, it was estimated that  
a determination of reportability would be made within thirty (30) days.

Due to the extensive investigation and evaluation required, an Interim  
Report is attached. It is now expected that this information will be  
finalized by November 2, 1982, at which time a complete report will be  
submitted.

Very truly yours,

E. E. Van Brunt, Jr.  
APS Vice President  
Nuclear Projects Management  
ANPP Project Director

EEVBjr/GHD:db

Attachment

cc: See Attached Page 2

U. S. Nuclear Regulatory Commission  
Attention: Mr. T. W. Bishop, Chief

August 30, 1982  
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Page 2

cc: Richard DeYoung, Director  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

T. G. Woods, Jr.  
J. A. Roedel  
D. B. Fasnacht  
G. C. Andognini  
A. C. Rogers  
B. S. Kaplan  
W. E. Ide  
J. Vorees  
J. A. Brand  
A. C. Gehr  
W. J. Stubblefield  
W. G. Bingham  
R. L. Patterson  
R. W. Welcher  
R. M. Grant  
D. R. Hawkinson  
L. E. Vorderbrueggen  
G. A. Fiorelli

Lynne Bernabei, Esq.  
Harmon & Weiss  
1725 "I" Street, NW  
Suite 506  
Washington, D. C. 20006

R. L. Greenfield  
Assistant Attorney General  
Bataan Memorial Building  
Santa Fe, New Mexico 87503

INTERIM REPORT - DER 82-39  
POTENTIAL REPORTABLE DEFICIENCY  
ARIZONA PUBLIC SERVICE COMPANY (APS)  
PVNGS UNIT 1

I. POTENTIAL PROBLEM

Based on design review and APS observations reported, the following Class IE Electrical Equipment is apparently installed below the maximum containment flood level (Elevation 90 feet 6 inches).

	<u>Tag No. (Valve)</u>	<u>IE Equipment</u>	<u>Tag No.</u>
Item 1	SIA-UV-651	Limiterorque - VMO	-
Item 2	CHA-UV-506	NAMCO Limit Switch	CHA-ZSH-506
Item 3	CHA-UV-506	NAMCO Limit Switch	CHA-ZSL-506
Item 4	SIA-UV-682	NAMCO Limit Switch	SIA-ZSL-682
Item 5	SIA-UV-682	NAMCO Limit Switch	SIA-ZSH-682

The following Post-Flood Operability Requirements (DBE) apply to equipment as noted:

- a. Valve Tag No. SI-651 (Item 1) and VMO shall be operable for one (1) year post-DBE.
- b. Valve Tag No. CH-506 (Items 2 and 3) shall close on CIAS signal, operate up to thirty-six (36) hours post-DBE, or fail to required closed position.
- c. Valve Tag No. SI-682 (Items 4 and 5) shall operate for thirty-six (36) hours post-DBE, or fail to required closed position.
- d. NAMCO Limit switches for valves CH-506 (Items 2 and 3) and SI-682 (Items 4 and 5) are required to provide valve position indication for duration of post-DBE period.

II. APPROACH TO AND STATUS OF PROPOSED RESOLUTION

Bechtel Engineering has evaluated the submergence problem, and provides the following resolution plan:

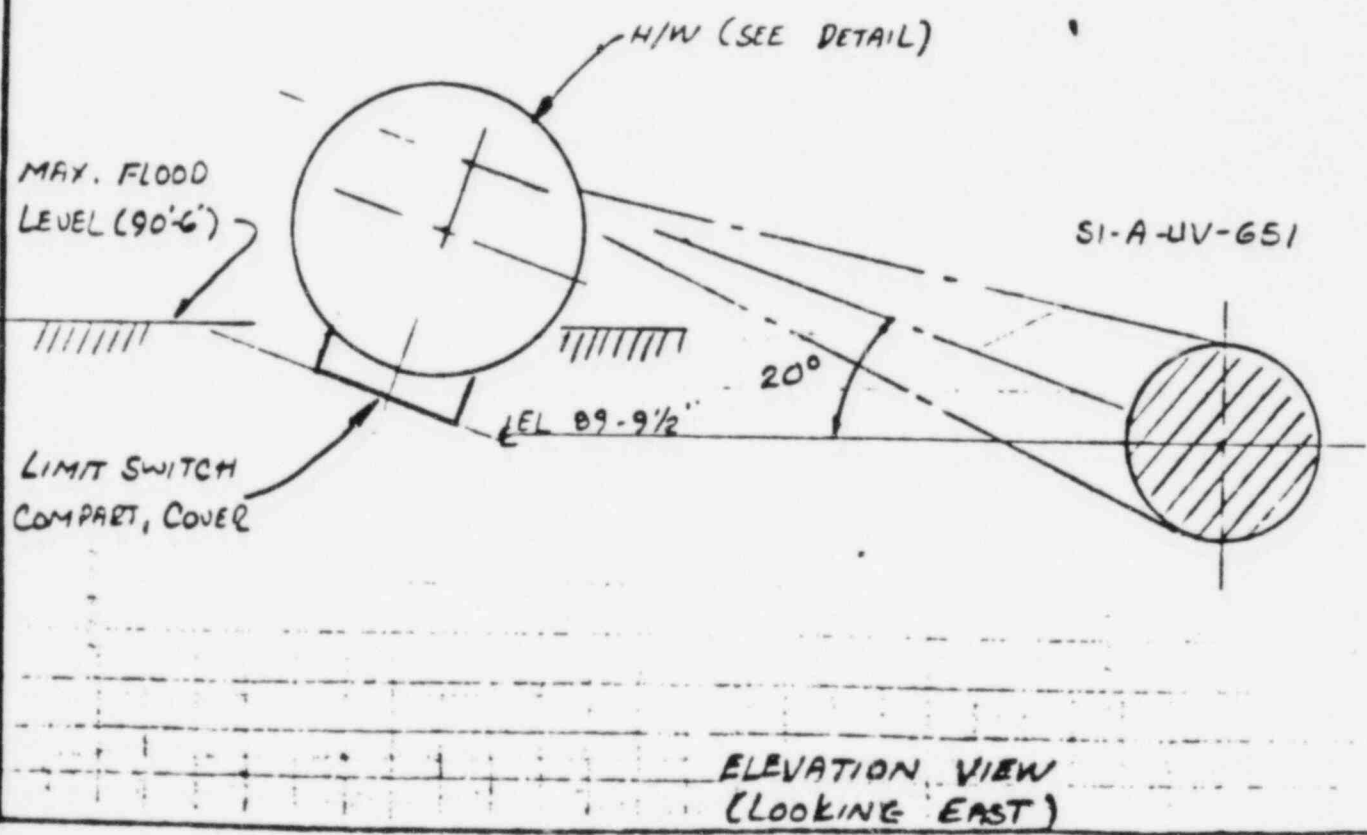
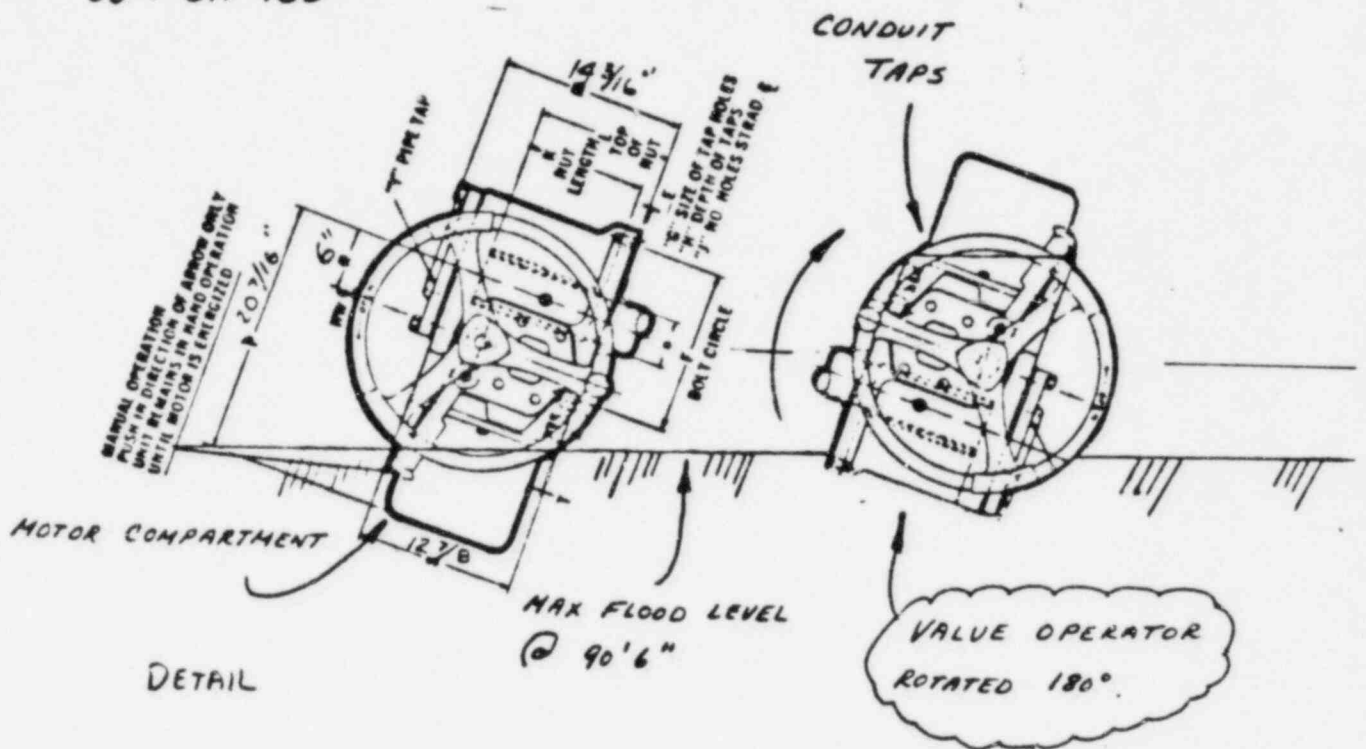
1. Item 1 - Valve Tag No. SIA-UV-651: Engineering has determined that rotation of the valve operator by 180° will locate the motor and electrical terminations above the maximum containment flood level. A DCP will be initiated to rotate the valve operator as shown on Attachment 1.
2. Items 2 through 5: Currently, the NAMCO Limit Switches supplied with valves CHA-UV-506 and SIA-UV-682 are series EA170 limit switches. These limit switches are not qualified for harsh environment conditions above or below the maximum flood level. Combustion Engineering recognizes this problem and recommends that the EA170 switches be replaced with the series EA180 switches currently being qualified under the C-E Environmental Qualification Program. However,

submergence is not listed as a qualification requirement. A NAMCO representative indicated that the EA180 switches should have no problems qualifying for submergence in a post-LOCA environment. Therefore, C-E will be instructed to include submergence as a post-LOCA operability requirement for qualification of NAMCO EA180 Limit Switches.

III. PROJECTED COMPLETION OF CORRECTIVE ACTION  
AND SUBMITTAL OF THE FINAL REPORT

Evaluation of this condition and submittal of the Final Report is forecast to be completed by November 2, 1982.

DWG. NO01-11.04 -39 & NO01-11.04 -245  
DWE. 01-P-SIF-105  
23-P-SIF-105



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ELEVATION VIEW  
(LOOKING EAST)