

Arizona Public Service Company

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January 23, 1984
ANPP-28678-BSK/TRB

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1450 Maria Lane - Suite 210
Walnut Creek, CA 94596-5368

Attention: Mr. T. W. Bishop, Director
Division of Resident
Reactor Projects and Engineering Programs

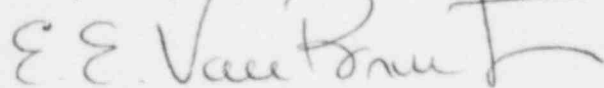
Subject: Final Report - DER 83-65
A 50.55(e) Reportable Condition Relating to PSV's From C-E
Were Discovered In Poor Condition When Preparing For Unit 2
Cold-Hydro
File: 84-019-026; D.4.33.2

Reference: A) Telephone Conversation between P. Johnson and R. Tucker on
September 28, 1983
B) ANPP-28097, dated October 26, 1983 (Interim Report)

Dear Sir:

Attached is our final written report of the Reportable Deficiency under
10CFR50.55(e), referenced above.

Very truly yours,



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

EEVB/TRB:ru
Attachment

cc: See Page Two

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Mr. T. W. Bishop
DER 83-65
Page Two

cc: Richard DeYoung, Director
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Washington, D. C. 20555

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FINAL REPORT - DER 83-65
DEFICIENCY EVALUATION 50.55(e)
ARIZONA PUBLIC SERVICE COMPANY (APS)
PVNGS UNITS 2

I. Description of Deficiency

During preparation for Unit 2 reactor coolant system hydrotesting in September, 1983, the primary safety relief valves 2-J-RCE-PSV-200, -201, -202, and -203 were removed by Startup and found to be dirty, rusted and coated with condensate throughout the internals. The valves were supplied by Combustion Engineering (C-E) and manufactured by Dresser Valve Company.

The subject valves were installed in 1981 for construction fitup. The valves were left in place while adjacent construction activities proceeded. Additionally, pneumatic pressure testing was done on the relief-side piping with the valves left in place. Either of these actions could cause the contaminated condition.

The cause is attributed to noncompliance with specification and procedural requirements as follows:

- a. The Dresser technical manual log no. 10407-N001-6.04-55 states that "The Nuclear Power Plant owner or his agent is responsible for providing a program to protect the cleanliness level of the valve and their (SIC) spare parts at the construction site in compliance with ANSI N.45.2.1, cleanliness level B."
- b. Bechtel work procedure WPP/QCI No. 203.0 for piping system pressure testing states the "Flanged pressure relief valves (PSV's) shall be removed or blinded off during pressure tests."

II. Analysis of Safety Implications

This condition is evaluated as reportable under the requirements of 10CFR50.55(e). Prudent evaluation of this condition indicates that the condition cannot remain uncorrected without representing a significant safety condition. Malfunction of primary safety relief valves can result in (1) overpressure of the primary system, or (2) uncontrolled release of radioactive steam to the containment. The deficiency constitutes damage to components which will require repair and testing to re-establish the adequacy of the components to perform their safety related function.

III. Corrective Action

1. The Unit 2 valves will be sent to Wyle Laboratories for reconditioning and testing prior to reinstallation as dispositioned by NCR SM-2886.
2. The Dresser Technical Manual log no. 10407-N001-6.04-55 has been revised by Bechtel to emphasize the importance of the ANSI N45.2.1 cleanliness requirements.
3. To preclude recurrence of this condition on Unit 3, Bechtel Engineering will send an interoffice memorandum which advises Bechtel Construction to remove the currently installed Unit 3 valves and verify that they meet the cleanliness requirements of ANSI N45.2.1 Level B. The valves will then be stored in accordance with the Dresser Technical Manual until Hot Functional Testing on Unit 3.
4. The cleanliness level for the Unit 1 primary safety valves has been addressed in DER 82-54.