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July 11, 1984
ANPP-29941-TDS/TRB

U. S. Nuclear Regulatory Commission
Region V
Creekside Oaks Office Park
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 84-11
A 50.55(e) Reportable Condition Relating To Conduit Used In
The PVMP Instrumentation Is Contaminated.
File: 84-019-026; D.4.33.2

Reference: A) Telephone Conversation between P. Johnson and T. Bradish on
March 8, 1984
B) ANPP-29213, dated April 3, 1984 (Interim Report)
C) ANPP-29602, dated May 25, 1984 (Time Extension)

Dear Sir:

Attached is our final written report of the deficiency referenced above,
which has been determined to be Not Reportable under the requirements of
10CFR50.55(e).

Very truly yours,

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

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Attachment

cc: See Page Two

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Mr. T. W. Bishop
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cc: Richard DeYoung, Director
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FINAL REPORT - DER 84-11
DEFICIENCY EVALUATION 50.55(e)
ARIZONA PUBLIC SERVICE COMPANY (APS)
PVNGS UNIT 1

I. Description of Deficiency

Combustion Engineering (CE) installed electrical conduit on the Control Element Assembly (CEA) shroud of the Unit 1 reactor to accommodate the Precritical Vibration Monitoring Program (PVMP) instrumentation. NCR SM-3729 documents the finding of chlorides, fluorides and other contaminants inside this conduit, which had not been properly cleaned prior to installation.

The PVMP instrumentation was designed for special tests and all of it, including the electrical conduit, will be removed from the Unit 1 CEA shroud prior to fuel load. Similar tests will not be conducted on Units 2 and 3.

II. Analysis of Safety Implications

CE has reviewed this deficiency with respect to the following conditions:

- A. The contamination, if concentrated only within the conduit, would have been of a level that could have caused a failure of the instrumentation system. Since the PVMP instrumentation is temporary and not safety-related, this condition does not constitute a safety-related deficiency.
- B. Had the contamination escaped into the Reactor Coolant System it would have been absorbed, and the resulting concentration would have been far below the allowable limits given in Table 3.4-1 of CESSAR-F (Chapter 16).
- C. A remote possibility exists that the contaminant could have worked its way through the conduit and concentrated in the vicinity of the instrumentation/core shroud tube interface during the RCS demonstration test. It is also possible, though unlikely, that stress corrosion cracking could have been induced at this interface. The RCS demonstration test will be conducted to demonstrate the adequacy of the modifications made to the reactor coolant system equipment as a result of the problems encountered during hot functional testing. Post test inspection of the CEA shroud assembly is required and will be performed via CE site process sheets 652600. This inspection is specifically looking for cracking of the CEA shroud assembly.

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Due to the short duration of the demonstration test and the absence of all but residual stresses in the shroud tube it is believed that stress corrosion cracking could not have occurred. If, however, a crack were to have been initiated it would either have been discovered during the post test inspection or if the crack were so small as to have escaped detection, it would not propagate once the instrumentation was removed thereby returning the area of the instrumentation interface to a clean environment.

The condition described herein is evaluated as Not Reportable under 10CFR Part 50.55(e) and/or Part 21 since, if uncorrected, it would not have adversely affected the safety of plant operations.

III. Corrective Action

NCR SM-3729 has been dispositioned rework. The contaminated conduit has been removed and replaced with verified Class B clean conduit.