## Arizona Public Service Company

ANPP-EEVB/WJP/WFQ-32027 February 28, 1985

John B. Martin, Regional Administrator U.S. Nuclear Regulatory Commission Region V 1450 Maria Lane, Suite 210 Walnut Creek, CA 94596-5368

Subject: Palo Verde Nuclear Generating Starlon (PVNGS) Units 1, 2 and 3 Docket Nos. STN-50-528 (License No. NPF-34)/529/530 NRC IE Bulletin 84-03 Refueling Cavity Water Seal File: 85-056-026; G.1.01.10

References: (A) NRC IE Bulletin 84-03 Refueling Cavity Water Seal (B) ANPP Letter to NRC, 11/14/84 (ANPP 31121-EEVB/SRF)

Dear Mr. Martin:

ANPP has reviewed IE Bulletin No. 84-03, which requests licensees review the Haddam Neck seal failure and evaluate the potential for and consequences of a refueling cavity water seal failure and provide a summary report of these actions. Reference (B) requested an extension to the end of February, 1985 to respond to the Bulletin. This is an interim report on the progress made to date. Design modifications to the refueling cavity water seal at PVNGS are currently being implemented. The design modifications will incorporate the consideration of the Haddam Neck experience. The seals are being reinforced with stainless steel pins in the elastomer seal flange. While the PVNGC design seals are also Presray inflatable type, there are some important differences between these and the Haddam Neck design such as:

- The PVNGS design incorporates 24 seal supports from the seal ribs whereas the Haddam Neck design is only supported at nine locations.
- 2. The gaps between the reactor flange and pool seal assembly and containment embedment ring are controlled by means of two locating pins. The pins, 1-7/16 inch diameter, are necessary for gap control. The original Haddam Neck design did not contain any locating pins.

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ANPP has contracted Combustion Engineering, the NSSS supplier, to investigate the modified pool seal assembly. Among the items to be addressed are:

- 1. Reliability Evaluation
- 2. Heat Loss Analysis
- 3. Refueling Machine Review
- 4. Fuel Bundle Drop Analysis and Test
- 5. Containment, Spent Fuel Building and Boundary Dose Rates

The ANPP final response to IE Bulletin 84-03 will be submitted by April 30, 1985. This will allow us to complete the design modifications and evaluations of the refueling cavity water seal design.

If you have any questions, please contact me.

Very truly yours,

E.E. Vaut race

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

EEVBJr/WJP/dh

- cc: R. Zimmerman
  - A. C. Gehr
  - U. S. NRC Document Control Desk (Original)

STATE OF ARIZONA ) ) ss. COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President, Nuclear Production of Arizona Public Service Company, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority to do so, that I have read such document and know its contents, and that to the best of my knowledge and belief the statements made therein are true.

Edurin E. Van Brunt, Jr.

Sworn to before me this 38 day of Hebruary, 1985. Dora E. Meador Notary Public

My Commission Expires:

My Commission Expires April 6, 1987