

Docket Nos.: 50-528, 50-529
and 50-530

MAR 05 1984

MEMORANDUM FOR: Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing

THRU: George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing

FROM: E. A. Licitra, Project Manager
Licensing Branch No. 3
Division of Licensing

SUBJECT: APPEALS MEETING FOR PALO VERDE REGARDING STAFF REQUIREMENT
FOR SOURCE RANGE NEUTRON FLUX MONITOR AS PART OF REMOTE
SHUTDOWN CAPABILITY

Arizona Public Service Company (applicant) has requested a meeting to appeal the staff requirement for a source range neutron flux monitor in the remote shutdown panel for Palo Verde. The appeals meeting has been tentatively scheduled for March 20, 1984 at 3:00 pm in P-118. Final arrangements will be made shortly. In preparation for that meeting, we are providing you with the following background information.

- (1) NRC letter from F. Miraglia to E. Van Brunt, dated June 11, 1982, (which informed the applicant of the subject staff position in order to meet Section III.L of Appendix R)
- (2) APS letter from E. Van Brunt to NRR, dated May 17, 1983 (in which APS responded that direct measurement of reactivity is not required from the remote shutdown panel since there are indirect measurements and procedures available to assure reactivity control - APS also stated that although it is not required to meet Section III.L of Appendix R, the above provisions for Palo Verde meet the intent of Section III.L)
- (3) NRC letter from G. Knighton to E. Van Brunt, dated July 28, 1983 (in which the staff responded that indirect indication is not acceptable for meeting Section III.L of Appendix R and enclosed the staff position for providing a direct indication of the reactor shutdown condition by using a source range neutron flux monitor)

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- (4) APS letter from E. Van Brunt to G. Knighton, dated November 23, 1983 (in which APS restated its May 17, 1983 position, but erroneously added that the occurrence of a boron dilution event does not affect the reactivity control function)
- (5) APS letter from E. Van Brunt to G. Knighton, dated February 14, 1984 (which supercedes the November 23, 1983 response, restates APS's position provided in May 17, 1983 and requests an appeal meeting)

With regard to other PWR plants (both ORs and OLs), the staff is requiring that a source range neutron flux monitor be provided as part of the remote shutdown capability which is independent of the control room. Duke Power Company (McGuire and Oconee) has successfully appealed this requirement because its plants have a dedicated remote shutdown system and also because makeup water for the reactor can only come from borated sources. No other OL utilities have appealed this staff position.

With regard to Appendix R requirements, although the regulation is addressed to plants licensed prior to January 1979, the Commission has approved a recommendation that, for OLs issued after September 30, 1981, utilities be required to identify differences between Appendix R requirements and the design and procedural methods proposed for their plants. Also, the Appendix R requirements are included in the Standard Review Plan.

Original signed by
E. A. Licitra

E. A. Licitra, Project Manager
Licensing Branch No. 3
Division of Licensing

Attachments:
As stated

cc: D. Eisenhut
R. Mattson
L. Rubenstein
O. Parr
J. Wermiel
N. Fioravante