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October 17, 1984 REGION V USE  
ANPP-30868-TDS/TRB

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

Attention: Mr. T. W. Bishop, Director  
Division of Reactor Safety and Projects

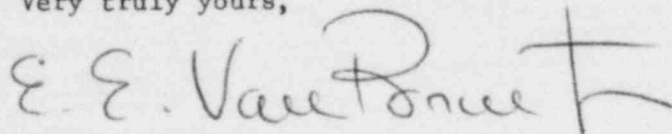
Subject: Final Report - DER 84-61  
A 50.55(e) Reportable Condition Relating To Auxiliary  
Pressurizer Spray System.  
File: 84-019-026; D.4.33.2

Reference: A) Telephone Conversation between D. Hollenbach and T. Bradish  
on August 14, 1984  
B) ANPP-30493, dated September 12, 1984 (Interim Report)

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

EEVB/TRB/nj  
Attachment

cc: See Page Two

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PDR

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Mr. T. W. Bishop  
DER 84-61  
Page Two

cc: Richard DeYoung, Director  
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U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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FINAL REPORT - DER 84-61  
DEFICIENCY EVALUATION 50.55(e)  
ARIZONA PUBLIC SERVICE COMPANY (APS)  
PVNGS UNITS 1, 2, 3

I. Description of Deficiency

The NRC stated in their letter dated April 3, 1984 that the Auxiliary Pressurizer Spray System (APSS) may lose the capability of performing its intended function if the loop charging valve (CH-PDV-240) mechanically sticks open, because insufficient APSS flow toward the pressurizer could result.

Evaluation

The Project's position is that adequate means of RCS depressurization exists to eliminate the NRC concerns. The APSS is not required for an RSB BTP 5-1 type cooldown. In the event of a single failure of loop charging valve (CH-PDV-240), depressurization of the pressurizer can be performed utilizing the Gas Vent System. The remote-operated valves in this depressurization path is compatible with that of the APSS.

II. Analysis of Safety Implications

Consistent with the Project's position that failure of the loop charging valve does not constitute a significant deficiency, this condition is evaluated as not reportable under the requirements of 10CFR50.55(e) since this DER does not meet the definition of design and construction deficiencies as described in 10CFR50.55(e). The APSS is part of the standard C-E System 80 design which has previously been reviewed and approved by the NRC in the CESSAR. This condition is also not reportable under 10CFR Part 21.

III. Corrective Action

The Project has decided that a provision for a redundant valve would provide a positive safeguard for the APSS and preclude reliance on supplemental systems. Therefore this action was proposed in an NRC-ACRS meeting held August 10, 1984 and agreed as reasonable to ameliorate concerns with the APSS. A fail-closed pneumatically operated valve will be installed in series with valve CH-PDV-240. The installation of this valve is being performed by DCPs 1SM, 2SM, and 3CM-CH-197, Rev. 0. These DCPs have been initiated and will be implemented prior to fuel load for all three units.

A letter from A. E. Scherer, C-E, to D. G. Eisenhut, NRC, LD-84-051, dated September 18, 1984, committed to amend CESSAR-F to reflect this modification.