Arizona Nuclear Power Project
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January 30, 1986
ANPP-34868-EEVB/MAJ-98.07

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

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1 and 2
Docket Nos. STN-50-528 (License NPF-41)
STN-50-529 (License NPF-46)
Initial Test Program
File: 86-056-026

Dear Sir:

In accordance with PVNGS Unit 1 Facility Operating License NPF-41 and PVNGS Unit 2 Facility Operating License NPF-46, License Condition 2.C.(5), we are hereby submitting a change made to the PVNGS Initial Test Program. The change involves taking an exception to doing an in-place leak test on the Containment Cleanup HVAC system charcoal filters. A safety review and evaluation has been performed, in accordance with 10CFR50.59, and we have determined that there is not an unreviewed safety question involved with making this change. Attachment 1 to this letter provides a summary of the safety evaluation that was performed for this change.

If you have any questions concerning this subject, please contact Mr. William Quinn of my staff at (602) 943-7200 extension 4087.

Very truly yours,

EE Van Brunt Jr/JH

E. E. Van Brunt, Jr.
Executive Vice President
Project Director

EEVB/MAJ/rw
Attachment

cc: A. C. Gehr (all w/a)
E. A. Licitra
R. P. Zimmerman
J. Taylor, Office of Inspection and Enforcement

IE-01

Attachment 1

1. Description of Change Made to Initial Test Program - PVNGS Units 1 and 2

The change made to the Initial Test Program is to take exception to performing the in-place leak test on the charcoal filters of the Containment Normal Cleanup HVAC system. This HVAC system test was previously discussed in the PVNGS Final Safety Analysis Report, Test Description 14B.41, page 14B-57 and in Table 9A-1, page 9A-28.

2. Justification for the Change - Summary of Safety Evaluation

The purpose of the Containment Normal Cleanup HVAC system is to control airborne radioactivity below the level required for normal personnel access into Containment for inspection, maintenance and refueling operations by filtering the air. This system will remove airborne radioactiviity from the containment air by recirculation and without providing new air makeup.

The results of performing the in-place leak test on the Containment Normal Cleanup HVAC system charcoal filters, as currently described in the FSAR, would not be valid because there is no inlet duct associated with the system which would insure a smooth air flow distribution through the filters. There is no inlet duct because the system is located inside Containment and recirculates the air inside containment, never discharging air to the outside environment.

The probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated will not be increased by this change because the only equipment affected by this change is the Containment Normal Cleanup HVAC system itself. If a leak were to occur in the charcoal filter, this would result in a less efficient recirculation system thus requiring a longer recirculation time before personnel entry. Personnel safety would not be affected. The air that could be leaked through the charcoal filter will be released to the containment environment from which the air is being taken initially. This change does not create the possibility of an accident or malfunction of equipment because this change only deletes the in-place leak test on the charcoal filters. If the leak test were done, the results would be invalid for the reason described above.

Furthermore, the margin of safety defined in the PVNGS Technical Specifications has not been reduced by this change because the Containment Normal Cleanup HVAC system does not fall within the scope of the Technical Specifications. The margin of safety of Technical Specifications is based upon: containment integrity, internal pressure, initial temperature, depressurization and cooling systems, and control of combustible gases. The Containment Normal Cleanup HVAC system does not affect these parameters. Personnel access into containment is governed by the radiation levels within containment as monitored by the remote radiation monitors, not the operation of the Containment Normal Cleanup HVAC system.