



EA-03-009

Palo Verde Nuclear  
Generating Station

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ATTN: Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Unit 3  
Docket No. STN 50-530  
Special Report 3-SR-2005-001  
Report of Boron Deposit at Control Element Drive  
Mechanism Vent**

Dear Sirs:

Attached please find Special Report 3-SR-2005-001 prepared and submitted by Arizona Public Service (APS) pursuant to NRC Revised Order EA-03-009, dated February 20, 2004. Section IV.D of the Order requires licensees to perform certain visual inspections to identify potential boric acid leaks from pressure-retaining components above the Reactor Pressure Vessel head. Section IV.E of the Order requires licensees to submit reports detailing the inspection results within sixty (60) days after returning plants to operation.

This special report details the results of visual inspections performed at PVNGS Unit 3 subsequent to a reactor shutdown on May 22, 2005. The visual inspections were performed in accordance with the Boric Acid Corrosion Prevention Program which APS implements to identify and prevent boric acid corrosion of reactor pressure boundary components.

In accordance with 10 CFR 50.4(b)(1), copies of this report are being provided to the Region IV Administrator and the Palo Verde NRC Senior Resident Inspector.

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No commitments are being made to the NRC by this letter. If you have questions regarding this submittal, please contact Dan Marks, Section Leader, Compliance, at (623) 393-6492.

Sincerely,

A handwritten signature in black ink, appearing to read "David Mauldin". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

CDM/CKS/DGM/DFH/ca

Attachment

cc: B. S. Mallet, Region IV Administrator  
M. B. Fields, PVNGS Project Manager  
G. G. Warnick, Sr. Resident Inspector  
Assistant General Counsel for Materials Litigation and Enforcement  
Rulemaking and Adjudication Staff

**Attachment**  
**Palo Verde Nuclear Generating Station Unit 3**  
**Special Report No. 3-SR-2005-001**  
**Boron Deposit Found at Control Element Drive Mechanism Vent**  
**Docket No. STN 50-530**

**Reporting Requirement:**

The NRC Revised Order EA-03-009, "Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors," dated February 20, 2004, Section IV.D requires that certain visual inspections be performed to identify potential boric acid leaks from pressure-retaining components above the reactor pressure vessel head.

Additionally, Section IV.E of the NRC Order requires that licensees submit reports detailing the inspection results performed per section IV.D within sixty (60) days after returning the plant to operation if a leak or boron deposit was found during the inspection.

**Background:**

On May 22, 2005, Palo Verde Unit 3 was shutdown for scheduled maintenance. Subsequent to the reactor shutdown, routine visual inspections were performed in accordance with the Boric Acid Corrosion Prevention Program (APS procedure 70TI-9ZC01). APS implemented the Boric Acid Corrosion Prevention Program to prevent boric acid corrosion of reactor pressure boundary components and to ensure the provisions of USNRC Generic Letter No. 88-05, "Boric Acid Corrosion of Carbon Steel Reactor Pressure Boundary Components in PWR Plants" were met.

**Report Detailing Inspection Results:**

During boric acid walk-downs on May 23, 2005, three Unit 3 boric acid residue sites were identified above the RPV head. The sites were located on the Versa Vents for control element drive mechanisms (CEDM) no. 7, 41 and 70. On May 29, 2005, Unit 3 commenced a plant heat up but due to equipment concerns, the plant was cooled back down and a subsequent boric acid walk-down revealed four additional boric acid residual sites above the RPV head. The sites were located on the Versa Vents for CEDM no. 22, 45, 81 and 87. None of the sites exhibited evidence of an active leak, nor did the boric acid residue contact the RPV head or related insulation and no carbon steel was affected.

All seven of the Versa Vents were reworked during the outage. Unit 3 was returned to operation (Mode 1) on June 23, 2005.