ARIZONA NUCLEAR POWER PROJECT
Post Office Box 21666 Phoenix, Arizona 85036

January 30, 1979
ANPP-12501-RLR/JMA

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Atten: Mr. Harold R. Denton, Director

Re: Palo Verde Nuclear Generating Station
Units 1, 2 & 3: Docket Nos. STN-50-528/529/530

Dear Mr. Denton:

As you are aware, Class 1E Equipment Qualification has received considerable attention during the Construction Permit Review for PVNGS Units 1, 2 and 3 and CESSAR.

Both Combustion Engineering and Arizona Public Service have established programs to ensure the Class 1E equipment is qualified to the applicable codes and standards. CE has submitted a topical report entitled "Class 1E Qualification, CENPD 255" during July, 1977, so that a review could be conducted by your technical staff. The report was submitted with the expectations that it would be referenced by Utility Applicants during their Licensing processes; we since have so referenced this document.

Your staff requested we submit typical vendor test programs for your review. In our letter of August 29, 1978, we submitted five such programs. There has yet been no response to these submittals. Much of our equipment is ordered and, in some cases, is being installed on PVNGS Units 1, 2 and 3. We are very concerned that these programs have not yet been reviewed, and we have no indication from the staff that our qualification methodology meets the requirements for Class 1E Equipment Qualification. There is little or no other criteria on how to meet these requirements.

We request that you take the following actions to expedite the Technical Review of CE's Topical Report CENPD-255 and the information submitted in our August 29, 1978 letter.

- Please provide, in your response to this letter, a date when a full Technical Review of the information would be completed and comments issued.

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- Provide a "mini-review" of the information with comments issued within three months.

- Provide a "mini-review" of the CENPD-255 Topical with comments as soon as possible.

We firmly believe that these actions will be to our mutual benefit and will lead to a shorter OL review time by identifying and resolving potential qualification problems with a minimum impact upon schedule and costs. We would be most happy to discuss this subject with your staff.

Very truly yours,

E. E. Van Brunt/JMA

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

EEVBJr/JMA/sb

cc: R. L. Robb
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

NOTE TO: HAROLD DENTON

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50-528

Mr. E. E. Van Brunt, Jr.
Vice President, Nuclear Projects
Arizona Nuclear Power Project
P. O. Box 21666
Phoenix, Arizona 85036

Dear Mr. Van Brunt:

Your letter to me dated February 23, 1979 was one of several letters that I recently received concerning Combustion Engineering, Inc. topical report, "Qualification of Class IE Instrumentation" (CENPD-255). Your letter, as well as the others, expressed the concern that our review of this topical report would not be performed on a schedule compatible with Combustion Engineering's equipment qualification programs. In addition, your letter requested the status of your August 28, 1978 submittal of information on the qualification of balance-of-plant equipment. In response to your concern, I would like to discuss (1) our overall plan for reviewing the implementation of Institute of Electrical and Electronics Engineers (IEEE) Standard 323-1974, "Qualifying Class IE Equipment of Nuclear Power Generating Stations," (2) how we intend to proceed in our review of CENPD-255, and (3) the status of your August 29, 1978 submittal.

Recognizing that IEEE Standard 323-1974 represented a departure from the previous standard on equipment qualification, the staff developed Task Action Plan A-24, "Qualification of Class IE Safety-Related Equipment" to handle the generic aspects of the implementation of this standard. The purpose of this plan was to review and evaluate qualification methods, test plans, and test procedures for Class IE equipment presented in vendors' topical reports. The review of the topical reports was to be followed with an audit of qualification reports during the operating license review of each application.

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Our progress to date on Task Action Plan A-24 has been limited. Topical reports have been received from three nuclear steam supply system vendors, Westinghouse, Combustion Engineering, and Babcock & Wilcox. The Babcock & Wilcox report was not received until just recently, February 1, 1979. The first topical report that we reviewed was WCAP-8587, "Methodology for Qualifying Westinghouse PWR-SD Provided NSSS Safety Related Equipment." This report was reviewed first because the first operating license application that requires implementation of IEEE Standard 323-1974 employs a Westinghouse nuclear steam supply system. Our review of WCAP-8587 has lead us to conclude that we will not be able to write a generic evaluation of a qualification topical until we have reviewed detailed information on the implementation of the methodology on applications which reference WCAP-8587. Therefore, for the first several plants that reference that topical report, we plan to review in detail the methods used to qualify

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the equipment on a plant specific basis. We expect that as a result of our plant specific reviews, we will require modifications to the topical report. When adequate information has been incorporated into WCAP-8587 as a result of these plant reviews, we will issue a safety evaluation.

In concert with the acceptance review of the CESSAR System 80 final design approval submittal, the staff has completed a preliminary review of CENPD-255. The staff has found the discussion of qualification methodology to be much too general to support a detailed review. This matter was discussed with Combustion Engineering in a meeting on the CESSAR System 80 design on February 12, 1979. Subsequently, Combustion Engineering indicated that they are revising CENPD-255 and that a revision containing a portion of the information we require will be completed in July 1979. We expect that they will submit the revised report shortly thereafter. As soon as we receive the report and have determined that sufficient information has been provided for us to initiate our review we will develop a review schedule. We will continue to keep you informed by sending you notices of meetings and meeting summaries dealing with this topical report.

Your August 28, 1978 submittal was in response to our generic letter dated September 14, 1977 to you on environmental qualification of balance-of-plant electrical components. To date, this information has not been reviewed and there are no plans to perform this review until the submittal of the Final Safety Analysis Report for the Palo Verde Nuclear Generating Station, Units 1, 2 and 3. However, if members of your technical staff have any particular questions regarding environmental qualification, a meeting can be arranged to discuss these questions.

I trust you will find this information useful.

Sincerely,

Original Signed by
H. R. Denton

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

DSS RSatterfield 3/20/79 | DSS RMattson 3/22/79 | NRR EGCase 3/27/79

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