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 RECIP. NAME RECIPIENT AFFILIATION
 TEDESCO, R.L. Assistant Director for Licensing

SUBJECT: Submits comments on NUREG-0857, facilities SER. Several inconsistencies found. Section 6.2.4 incorrectly describes containment isolation sys.

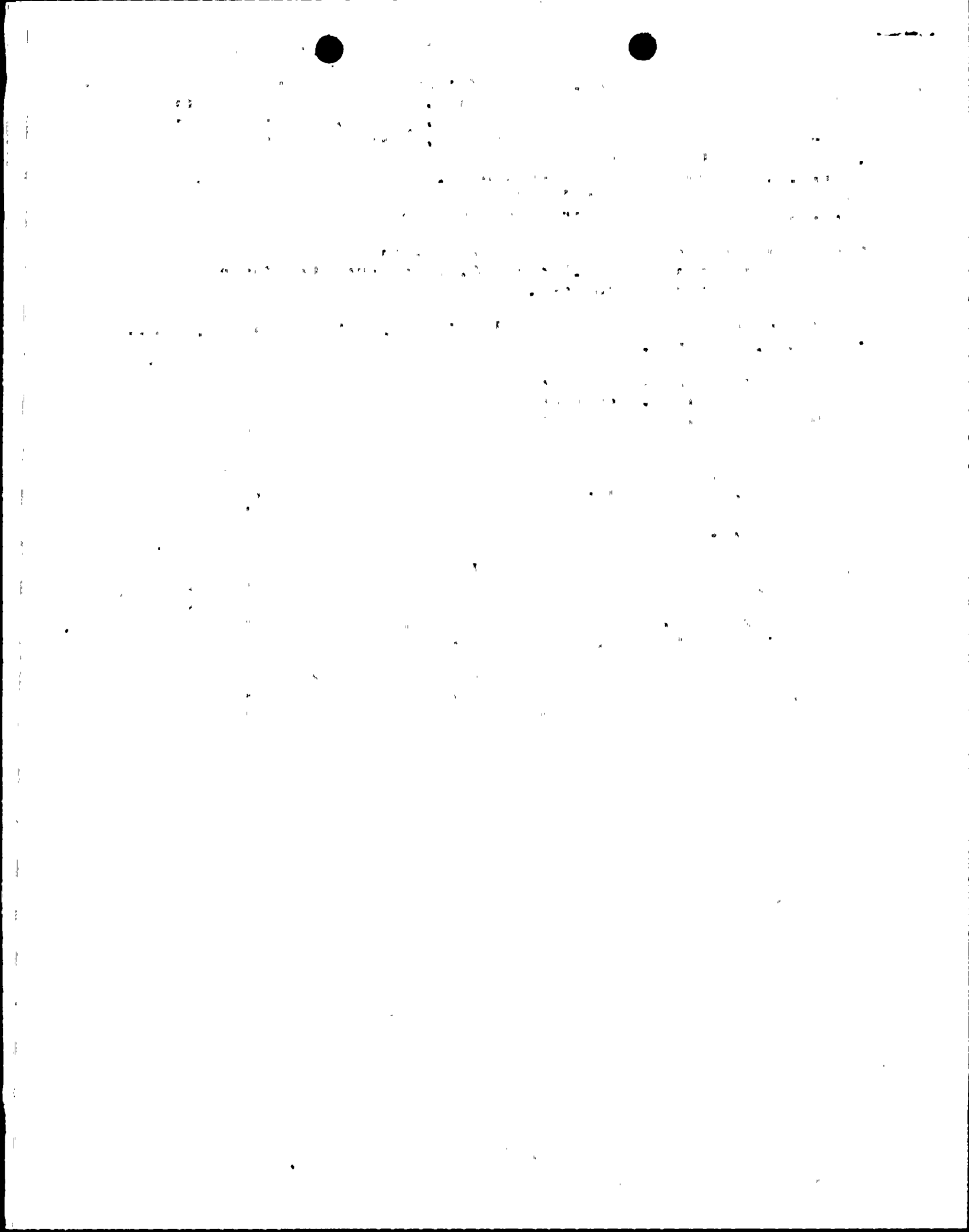
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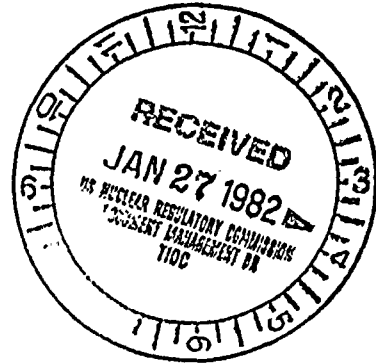
STA. _____

P.O. BOX 21666 - PHOENIX, ARIZONA 85036

January 25, 1982

ANPP-19992 - JMA/TFQ

Mr. R. L. Tedesco
Assistant Director for Licensing
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Subject: Palo Verde Nuclear Generating Station
(PVNGS) Units 1, 2 and 3
Docket Nos. STN-50-528/529/530
File: 82-056-026; G.1.10

Reference: NUREG-0857, "Safety Evaluation Report" related to
the Operation of Palo Verde Nuclear Generating
Station Units 1, 2 and 3, dated November, 1981

Dear Mr. Tedesco:

During a review of the referenced document, we have found several inconsistencies which we would like to bring to your attention.

Section 5.4.3 discusses power sources for the Lower Pressure Safety Injection (LPSI) pump low flow alarms. This issue is considered a confirmatory item by the NRC staff. We have been asked to confirm that the subject alarms are powered from an emergency power source. The alarm is produced by the Plant Monitoring System (PMS). Both the PMS and the LPSI pump and low flow alarm are within the CESSAR scope and should, therefore, be resolved on the CESSAR docket.

Section 6.2.4 incorrectly describes the PVNGS containment isolation system. It presently states:

"The staff has reviewed the applicant's containment isolation system and has found that...(5) each power-operated isolation valve assumes the position of greater safety in the event of power failure to the valve operator..."

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The power-operated containment isolation valves used at PVNGS are "fail-as-is" valves in the event of power failure. The PVNGS design uses two power-operated containment isolation valves powered from separate IE power sources whenever power-operated valves are used for containment isolation. With this design, the containment can be isolated with a failure of one IE power source.

Section 9.5.1.9, Compliance with Appendix R, incorrectly states that:

"The emergency lighting fixtures are designed to provide rated lighting for a minimum continuous period of 2 hours. Spare self-contained battery pack units will be readily available as required should there be a need for DC lighting in excess of 2 hours."

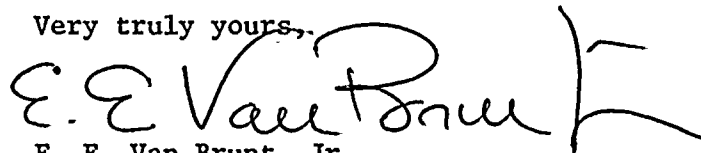
The PVNGS FSAR states in Section 9.5.3.2.2.3 that:

"The emergency lighting fixtures are designed to provide rated lighting for a minimum continuous period of 8 hours. Spare self-contained battery pack units will readily be available to areas as required should there be a need for DC lighting in excess of 8 hours."

Therefore, we feel that PVNGS meets the requirements of 10 CFR Part 50, Appendix R, Section III.J, and Branch Technical Position ASB 9.5-1, Appendix A, Section C.5.g.

Please contact me if you have any questions on these matters.

Very truly yours,



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

EEVBJr/TFQ/av

cc: M. Licitra
P. Hourihan
R. L. Greenfield
A. C. Gehr

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President Nuclear Projects of Arizona Public Service Company, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority so to do, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true.

Edwin E. Van Brunt Jr.
Edwin E. Van Brunt, Jr.

Sworn to before me this 26TH day of JANUARY, 1982.

Connie Lou Armstrong
Notary Public

My Commission expires:

June 24, 1983

