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 VAN BRUNT,E.E. Arizona Public Service Co.  
 RECIP.NAME: RECIPIENT AFFILIATION  
 KNIGHTON,G. Licensing Branch 3

SUBJECT: Forwards proposed change to FSAR Section 1.8 re exception to Reg Guide 1.68.Exception uses guidelines in App B of Reg Guide 1.68,Rev 2. to have procedures available either 60 days prior to fuel load or 60 days prior to scheduled use.

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Arizona Public Service Company

Director of Nuclear Reactor Regulation  
Attention: Mr. George Knighton, Chief  
Licensing Branch No. 3  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

October 15, 1984  
ANPP-30841 TFQ/JYM

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2 and 3  
Docket Nos. STN-50-528/529/530  
Exception to R. G. 1.68; procedure availability  
File: 84-056-026; G.1.01.10

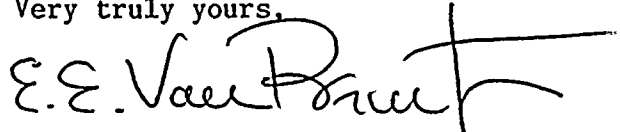
Dear Mr. Knighton:

Attached is a proposed change to Section 1.8 of the FSAR concerning an exception to Regulatory Guide 1.68, as requested by the staff reviewer.

The exception uses the guidelines in Appendix B of Regulatory Guide 1.68 Revision 2, August 1978, in lieu of Revision 0, November 1973, to have procedures available either 60 days prior to fuel load or 60 days prior to their scheduled use.

If you have any questions, please contact me.

Very truly yours,



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

EEVBJr/JYM/bg  
Attachment

cc: E. A. Licitra w/a  
A. C. Gehr w/a  
D. Becker w/a

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PDR ADDCK 05000528  
A PDR

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ANPP-30841

STATE OF ARIZONA     )  
                              ) ss.  
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President, Nuclear Production of Arizona Public Service Company, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority to do so, 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 15 day of October, 1984.

Jora E. Meador  
Notary Public

My Commission Expires:  
My Commission Expires April 6, 1987



- B. Position C.1 of Regulatory Guide 1.67 requires that the magnitude of the reaction force, the anticipated transient behavior, and the basis for their determination should be included in the design specification for the valve. Since all of the above are characteristic to each valve manufacturer, it is not current practice to stipulate these data. Rather, the manufacturer supplies that information after selection of the valve, orifice size, inlet and outlet OD, etc., to accommodate the flow rates required by the Design Specification. This manufacturer supplied information is then used in the design of the relief/safety valve, as discussed in section 3.9.3.3, Design and Installation Criteria, Pressure-Relieving Devices (Open System).

REGULATORY GUIDE 1.68: Preoperational and Initial Startup  
Test Programs for Water-Cooled Power  
Reactors (Revision 0, November 1973)

RESPONSE

The positions and guidelines of Regulatory Guide 1.68 are accepted with the following exceptions and clarifications:

- A. Power Ascension Tests will be conducted using power plateaus of 20%, 50%, 80%, and 100% instead of 25%, 50%, 75%, 100% as recommended in paragraph D.4 of Appendix A to Regulatory Guide 1.68.
- B. Procedures will be available 60 days prior to their scheduled use instead of 30 days prior to their scheduled use or 90 days prior to fuel load as recommended in paragraph 2 of Appendix B to Regulatory Guide 1.68. (See section 14.2.11.)
- C. Implementation of Regulatory Guide 1.68 is discussed in section 14.2 and in CESSAR section 1.8. See CESSAR 14.2.7.1 for additional exceptions and clarifications to Regulatory Guide 1.68.

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either 60 days prior to fuel load or 60 days prior to their scheduled use as recommended in Appendix B of Regulatory Guide 1.68 (Revision 2, August 1978.) which is used in lieu of the Revision 0, November 1973. See section 14.2.11 for a further clarification of procedure availability.

