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 FACIL:STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528
 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530
 AUTH.NAME AUTHOR AFFILIATION
 VAN BRUNT,E.E. Arizona Public Service Co.
 RECIP.NAME RECIPIENT AFFILIATION
 KNIGHTON,G.W. Licensing Branch 3

SUBJECT: Contends that spent fuel pool cooling pumps exempt from ASME
 Section XI insp/testing requirements.Deletion of pumps from
 ASME requirements does not reduce level of safety.

DISTRIBUTION CODE: B001D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 2
 TITLE: Licensing Submittal: PSAR/FSAR Amdts & Related Correspondence

NOTES:Standardized plant. 05000528
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THE SECRETARY OF THE ARMY
 WASHINGTON, D. C.
 DEPARTMENT OF THE ARMY
 OFFICE OF THE SECRETARY
 1914

1. The following is a list of the names of the
 officers who were promoted to the rank of
 Major in the year 1914.

NAME	REGIMENT	COMPANY	DATE OF PROMOTION
1. [Name]	1st	A	1914
2. [Name]	2nd	B	1914
3. [Name]	3rd	C	1914
4. [Name]	4th	D	1914
5. [Name]	5th	E	1914
6. [Name]	6th	F	1914
7. [Name]	7th	G	1914
8. [Name]	8th	H	1914
9. [Name]	9th	I	1914
10. [Name]	10th	J	1914
11. [Name]	11th	K	1914
12. [Name]	12th	L	1914
13. [Name]	13th	M	1914
14. [Name]	14th	N	1914
15. [Name]	15th	O	1914
16. [Name]	16th	P	1914
17. [Name]	17th	Q	1914
18. [Name]	18th	R	1914
19. [Name]	19th	S	1914
20. [Name]	20th	T	1914
21. [Name]	21st	U	1914
22. [Name]	22nd	V	1914
23. [Name]	23rd	W	1914
24. [Name]	24th	X	1914
25. [Name]	25th	Y	1914
26. [Name]	26th	Z	1914
27. [Name]	27th	AA	1914
28. [Name]	28th	AB	1914
29. [Name]	29th	AC	1914
30. [Name]	30th	AD	1914
31. [Name]	31st	AE	1914
32. [Name]	32nd	AF	1914
33. [Name]	33rd	AG	1914
34. [Name]	34th	AH	1914
35. [Name]	35th	AI	1914
36. [Name]	36th	AJ	1914
37. [Name]	37th	AK	1914
38. [Name]	38th	AL	1914
39. [Name]	39th	AM	1914
40. [Name]	40th	AN	1914
41. [Name]	41st	AO	1914
42. [Name]	42nd	AP	1914
43. [Name]	43rd	AQ	1914
44. [Name]	44th	AR	1914
45. [Name]	45th	AS	1914
46. [Name]	46th	AT	1914
47. [Name]	47th	AU	1914
48. [Name]	48th	AV	1914
49. [Name]	49th	AW	1914
50. [Name]	50th	AX	1914
51. [Name]	51st	AY	1914
52. [Name]	52nd	AZ	1914
53. [Name]	53rd	BA	1914
54. [Name]	54th	BB	1914
55. [Name]	55th	BC	1914
56. [Name]	56th	BD	1914
57. [Name]	57th	BE	1914
58. [Name]	58th	BF	1914
59. [Name]	59th	BG	1914
60. [Name]	60th	BH	1914
61. [Name]	61st	BI	1914
62. [Name]	62nd	BJ	1914
63. [Name]	63rd	BK	1914
64. [Name]	64th	BL	1914
65. [Name]	65th	BM	1914
66. [Name]	66th	BN	1914
67. [Name]	67th	BO	1914
68. [Name]	68th	BP	1914
69. [Name]	69th	BQ	1914
70. [Name]	70th	BR	1914
71. [Name]	71st	BS	1914
72. [Name]	72nd	BT	1914
73. [Name]	73rd	BU	1914
74. [Name]	74th	BV	1914
75. [Name]	75th	BW	1914
76. [Name]	76th	BX	1914
77. [Name]	77th	BY	1914
78. [Name]	78th	BZ	1914
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80. [Name]	80th	CB	1914
81. [Name]	81st	CC	1914
82. [Name]	82nd	CD	1914
83. [Name]	83rd	CE	1914
84. [Name]	84th	CF	1914
85. [Name]	85th	CG	1914
86. [Name]	86th	CH	1914
87. [Name]	87th	CI	1914
88. [Name]	88th	CJ	1914
89. [Name]	89th	CK	1914
90. [Name]	90th	CL	1914
91. [Name]	91st	CM	1914
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94. [Name]	94th	CP	1914
95. [Name]	95th	CQ	1914
96. [Name]	96th	CR	1914
97. [Name]	97th	CS	1914
98. [Name]	98th	CT	1914
99. [Name]	99th	CU	1914
100. [Name]	100th	CV	1914

Arizona Public Service Company

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

December 18, 1984
ANPP-31499 WFQ/TFQ

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
ASME Section XI Inspection
Spent Fuel Pool Cooling Pumps
File: 84-056-026; G.1.01.10

Reference: Letter from E. E. Van Brunt, Jr., APS, to G. W. Knighton, NRC,
dated December 10, 1984 (ANPP-31404); Subject: Spent Fuel Pool
Cooling Pumps.

Dear Mr. Knighton:

The referenced letter contained a change to FSAR Table 3.9-21 that deleted the spent fuel pool cooling pumps from the ASME Section XI testing requirements for operational readiness. The ASME code specifically limits the applicability of Section XI to those pumps that are required to perform a specific function in shutting down the reactor or in mitigating the consequences of an accident and are provided with an emergency power source. The spent fuel pool cooling pumps do not mitigate the consequences of an accident and they are not safe shutdown components. Accordingly, these pumps are not subject to ASME Section XI, even though they are supplied with class IE emergency power.

Nevertheless, there is substantial assurance that these pumps are ready to operate on demand as they are normally running. Therefore, the deletion of these pumps from the ASME Section XI program does not reduce the level of safety at PVNGS and as such should be considered acceptable.

Please contact Mr. William Quinn of my staff if you have any questions regarding this information.

Very truly yours,

E. E. Van Brunt

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

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PDR ADDCK 05000528
Q PDR

EEVB/TFQ/mb

cc: E. A. Licitra
A. C. Gehr
R. P. Zimmerman

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December 18, 1984
ANPP-31499

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 18 day of December, 1984.

Nora E. Meador
Notary Public

My Commission Expires:
My Commission Expires April 6, 1987

