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Arizona Nuclear Power Project

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December 20, 1984

ANPP-31528-TDS/TRB

REGION VIDE

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U. S. Nuclear Regulatory Commission
Region V
1450 Maria Lane - Suite 210
Walnut Creek, CA 94596-5368

IE HQ FILE COPY

Attention: Mr. D. F. Kirsch, Acting Director
Division of Resident
Reactor Projects and Engineering Program

Subject: Deficiency Evaluation Report Revisions
File: 84-019-026; D.4.33.2

Dear Sir:

ANPP has conducted a review of revised final reports, submitted by our A/E, after transmittal of our Final Reports to your office.

Attached is a summary description and evaluation of the impact of changes to Final Reports which the ANPP has evaluated as substantive changes. Those revisions which have been evaluated as not substantive have been so noted in our files.

Very truly yours,

E. E. Van Brunt

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

EEVB/TRB/plk

Attachment

cc: See Page Two

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IE-28

Year	Percentage of Total Population
1950	55
1955	65
1960	62
1965	70
1970	75

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1. The first part of the document is a list of references. The references are listed in a standard format, with the author's name, the title of the work, and the publisher. The references are as follows:

1. J. H. Van der Linde, *Die Geschiedenis van die Kaapkolonie*, 1898, 1900, 1902, 1904, 1906, 1908, 1910, 1912, 1914, 1916, 1918, 1920, 1922, 1924, 1926, 1928, 1930, 1932, 1934, 1936, 1938, 1940, 1942, 1944, 1946, 1948, 1950, 1952, 1954, 1956, 1958, 1960, 1962, 1964, 1966, 1968, 1970, 1972, 1974, 1976, 1978, 1980, 1982, 1984, 1986, 1988, 1990, 1992, 1994, 1996, 1998, 2000, 2002, 2004, 2006, 2008, 2010, 2012, 2014, 2016, 2018, 2020, 2022, 2024, 2026, 2028, 2030, 2032, 2034, 2036, 2038, 2040, 2042, 2044, 2046, 2048, 2050, 2052, 2054, 2056, 2058, 2060, 2062, 2064, 2066, 2068, 2070, 2072, 2074, 2076, 2078, 2080, 2082, 2084, 2086, 2088, 2090, 2092, 2094, 2096, 2098, 2100, 2102, 2104, 2106, 2108, 2110, 2112, 2114, 2116, 2118, 2120, 2122, 2124, 2126, 2128, 2130, 2132, 2134, 2136, 2138, 2140, 2142, 2144, 2146, 2148, 2150, 2152, 2154, 2156, 2158, 2160, 2162, 2164, 2166, 2168, 2170, 2172, 2174, 2176, 2178, 2180, 2182, 2184, 2186, 2188, 2190, 2192, 2194, 2196, 2198, 2200, 2202, 2204, 2206, 2208, 2210, 2212, 2214, 2216, 2218, 2220, 2222, 2224, 2226, 2228, 2230, 2232, 2234, 2236, 2238, 2240, 2242, 2244, 2246, 2248, 2250, 2252, 2254, 2256, 2258, 2260, 2262, 2264, 2266, 2268, 2270, 2272, 2274, 2276, 2278, 2280, 2282, 2284, 2286, 2288, 2290, 2292, 2294, 2296, 2298, 2300, 2302, 2304, 2306, 2308, 2310, 2312, 2314, 2316, 2318, 2320, 2322, 2324, 2326, 2328, 2330, 2332, 2334, 2336, 2338, 2340, 2342, 2344, 2346, 2348, 2350, 2352, 2354, 2356, 2358, 2360, 2362, 2364, 2366, 2368, 2370, 2372, 2374, 2376, 2378, 2380, 2382, 2384, 2386, 2388, 2390, 2392, 2394, 2396, 2398, 2400, 2402, 2404, 2406, 2408, 2410, 2412, 2414, 2416, 2418, 2420, 2422, 2424, 2426, 2428, 2430, 2432, 2434, 2436, 2438, 2440, 2442, 2444, 2446, 2448, 2450, 2452, 2454, 2456, 2458, 2460, 2462, 2464, 2466, 2468, 2470, 2472, 2474, 2476, 2478, 2480, 2482, 2484, 2486, 2488, 2490, 2492, 2494, 2496, 2498, 2500, 2502, 2504, 2506, 2508, 2510, 2512, 2514, 2516, 2518, 2520, 2522, 2524, 2526, 2528, 2530, 2532, 2534, 2536, 2538, 2540, 2542, 2544, 2546, 2548, 2550, 2552, 2554, 2556, 2558, 2560, 2562, 2564, 2566, 2568, 2570, 2572, 2574, 2576, 2578, 2580, 2582, 2584, 2586, 2588, 2590, 2592, 2594, 2596, 2598, 2600, 2602, 2604, 2606, 2608, 2610, 2612, 2614, 2616, 2618, 2620, 2622, 2624, 2626, 2628, 2630, 2632, 2634, 2636, 2638, 2640, 2642, 2644, 2646, 2648, 2650, 2652, 2654, 2656, 2658, 2660, 2662, 2664, 2666, 2668, 2670, 2672, 2674, 2676, 2678, 2680, 2682, 2684, 2686, 2688, 2690, 2692, 2694, 2696, 2698, 2700, 2702, 2704, 2706, 2708, 2710, 2712, 2714, 2716, 2718, 2720, 2722, 2724, 2726, 2728, 2730, 2732, 2734, 2736, 2738, 2740, 2742, 2744, 2746, 2748, 2750, 2752, 2754, 2756, 2758, 2760, 2762, 2764, 2766, 2768, 2770, 2772, 2774, 2776, 2778, 2780, 2782, 2784, 2786, 2788, 2790, 2792, 2794, 2796, 2798, 2800, 2802, 2804, 2806, 2808, 2810, 2812, 2814, 2816, 2818, 2820, 2822, 2824, 2826, 2828, 2830, 2832, 2834, 2836, 2838, 2840, 2842, 2844, 2846, 2848, 2850, 2852, 2854, 2856, 2858, 2860, 2862, 2864, 2866, 2868, 2870, 2872, 2874, 2876, 2878, 2880, 2882, 2884, 2886, 2888, 2890, 2892, 2894, 2896, 2898, 2900, 2902, 2904, 2906, 2908, 2910, 2912, 2914, 2916, 2918, 2920, 2922, 2924, 2926, 2928, 2930, 2932, 2934, 2936, 2938, 2940, 2942, 2944, 2946, 2948, 2950, 2952, 2954, 2956, 2958, 2960, 2962, 2964, 2966, 2968, 2970, 2972, 2974, 2976, 2978, 2980, 2982, 2984, 2986, 2988, 2990, 2992, 2994, 2996, 2998, 3000, 3002, 3004, 3006, 3008, 3010, 3012, 3014, 3016, 3018, 3020, 3022, 3024, 3026, 3028, 3030, 3032, 3034, 3036, 3038, 3040, 3042, 3044, 3046, 3048, 3050, 3052, 3054, 3056, 3058, 3060, 3062, 3064, 3066, 3068, 3070, 3072, 3074, 3076, 3078, 3080, 3082, 3084, 3086, 3088, 3090, 3092, 3094, 3096, 3098, 3100, 3102, 3104, 3106, 3108, 3110, 3112, 3114, 3116, 3118, 3120, 3122, 3124, 3126, 3128, 3130, 3132, 3134, 3136, 3138, 3140, 3142, 3144, 3146, 3148, 3150, 3152, 3154, 3156, 3158, 3160, 3162, 3164, 3166, 3168, 3170, 3172, 3174, 3176, 3178, 3180, 3182, 3184, 3186, 3188, 3190, 3192, 3194, 3196, 3198, 3200, 3202, 3204, 3206, 3208, 3210, 3212, 3214, 3216, 3218, 3220, 3222, 3224, 3226, 3228, 3230, 3232

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 2. *Scirpus americanus* (L.) Link.
 3. *Scirpus setaceus* (L.) Link.
 4. *Scirpus robustus* (L.) Link.
 5. *Scirpus tabernaemontani* (Cav.) Trin. ex Steud.
 6. *Scirpus torreyana* (L.) Link.
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1. The first group of authors (e.g., [1, 2]) has shown that the rate of change of the concentration of the active species is proportional to the rate of change of the concentration of the reactants. This is the case for the reaction of the active species with the reactants.

Mr. D. F. Kirsch
Page Two

cc: Richard DeYoung, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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A. C. Rogers
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T. D. Shriver
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W. G. Bingham
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R. W. Welcher
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D. R. Hawkinson
R. P. Zimmerman
L. Clyde
M. Matt
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ATTACHMENT

SUMMARY OF DER REVISIONS

<u>DER NO.</u>	<u>SUMMARY OF CHANGE</u>	<u>IMPACT OF CHANGE</u>
80-29	Originally, Unit 3 modifications to the hydrogen monitor were to be performed under a DCP. This was changed to allow the supplier to make modifications to the hydrogen monitor pump and to specify future modifications of equipment delivered in the future.	The change only clarifies the corrective action responsibilities and has no impact on the resolution of the deficiency.
80-46	The original response stated that the pre-service examination (PSE) program would be revised. Further investigation revealed the PSE program did not need revision and the applicable NCR's were dispositioned USE-AS-IS.	The change reflects the findings of more extensive investigation only. There is no impact on the corrective action.
81-6	The corrective action was expanded to address Unit 2 and 3 ceiling support system. The original report only addressed Unit 1.	There is no impact resulting from this change. The Corrective Action was expanded to include inspections for Unit 2 and 3.
82-41	The criteria for visual inspection of crimp-type lugs in GE switchgear was expanded from, "The conductor shall be flush or protrude through the connector barrel up to approximately 1/16 inch" to the terminal lug is acceptable if the conductor is visible and underneath the crimp indentation (i.e., approximately 1/16" from the face of the barrel). In addition, the conductor extending beyond the barrel of the connector does not pose a problem unless it interferes with the termination screw, in which case it should be cut back.	This change was made to clarify, for field use, the allowable and acceptable criteria for crimp type lugs. This criteria meets or exceeds GE specifications and has no impact on the disposition of the DER.

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<u>DER NO.</u>	<u>SUMMARY OF CHANGE</u>	<u>IMPACT OF CHANGE</u>
82-42	The original Corrective Action stated that all stainless steel portions of tap nozzles would be replaced with a double socket piece of inconel. Revised Corrective Action states that RCP 2B in Unit 1 was replaced with a double socket piece of stainless steel.	There is no impact as a result of this change. CE letter V-CE-16760 states that the stainless portion of the nozzle will be replaced either by a double socket piece of either stainless steel or inconel.
82-58	The original Corrective Action stated that cubicles in Units 1, 2, and 3 would be anchored on four sides. Revised Corrective Action states that proper anchorage for the cubicles will be provided.	This change has no impact. This allows latitude in determining the most efficient method of mounting the cubicles for seismic qualification. In each case the seismic qualification requirements have been or will be met.
82-73	The revised Corrective Action clarifies actual steps taken as follows: 1) The five defective pipe clamps were rejected and returned to ITT Grinnell; 2) To preclude recurrence, Bechtel quality personnel at ITT Grinnell will conduct a complete dimensional and fit examination on all clamps of this type prior to shipment; 3) WPP/QCI No. 201.1, Nuclear Pipe Hanger and Support Installation, has been amended to include instructions for proper installation of this type of clamp.	This change details actual action taken to resolve this deficiency. Additionally, the project clarified by procedural change actual instructions for this type of pipe clamp. This action is considered prudent to preclude recurrence and has no impact on this DER.
82-81	Subsequent revisions to this report detailed the results of inspections performed by Honeywell. During these inspections, Honeywell reported numerous installations which had been modified after final inspection had been	The Corrective Actions originally specified in this DER were not completed in a timely manner. Therefore, the Project initiated DER 84-27 to thoroughly inspect and evaluate the conditions stemming from this DER. This action resulted in a comprehensive evaluation and corrective ac-

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DER NO.

SUMMARY OF CHANGE

IMPACT OF CHANGE

performed. These unauthorized modifications occurred along with other documented cases of improper original installations performed by Honeywell. As a result, the original intent of the Corrective Action, to verify compliance with engineering acceptance criteria, could not be met. The documentation, safety implications and implementation of corrective action for the conditions identified were transferred to DER 84-27.

tion plan to resolve the deficiencies noted.

83-8

The function of the timer in the Hydrogen Recombiner is to bypass the low flow alarm and trip function during initial startup of the units for 60 seconds. Subsequent to the decision to install sealed timers in the unit, Rockwell conducted further testing of the Recombiners and determined that this bypass feature was unnecessary due to the fact the blower motors rapidly reach operating speeds negating the need of a bypass timer. Therefore, the timers have been removed from the circuitry altogether.

This change was made to make the component more reliable and less likely to fail during operation.

83-22

This change was necessary to meet Project schedule. The Westinghouse breakers would have required a lead time for procurement which was unacceptable to the Project.

The ITE - Gould circuit breakers are fully environmentally qualified for this application in accordance with IEEE 323 therefore this change has no impact on this DER.

83-28

The original Corrective Action was to disposition the NCR's USE-AS-IS. Revised response states that NCR 5-260-1M will be "REworked and NCR 5-262-1M will be "Repair/USE-AS-IS".

This change has no impact. It clarifies the actual corrective action taken to correct one shock suppressors minimum reserve requirement.

THE A. J. ...

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|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 83-43 | The original report stated that all cabinets supplied by Harlo would be inspected. The revised report clarifies that all Class 1E cabinets will be inspected. | There is no impact resulting from this action. Non-1E cabinets are not a safety concern. |
| 83-44 | Originally, the cause of the deficiency was thought to be due to an error in the wiring during implementation of a CE Field Action Request. Further investigation revealed that, in actuality, there was an error in the field modification procedure which caused the error. | As a result of this condition, CE conducted a review of their QA program to preclude recurrence of this or similar deficiencies. Additionally, reviews of design interfaces have been conducted and found acceptable. |
| 83-45 | The original report did not address APS CAR C-83-94N which identified additional equipment in violation of the FSAR. The additional equipment is as follows:
1J-RMA-B01, B02, B06, 1J-RMD-B02E, 1J-RMB-B04, 1J-RMC-B04, B07, 1J-RMD-B04, B05, B07, 1J-RMN-B05. | The change addressed the additional equipment and included the requirements of the FSAR into the applicable project specification. |
| 83-62 | The two (2) missing staking pins will be replaced and inspected to assure no excessive gap exists between the staking pin O.D. and hole I.D. The length of the new pins will be determined by the applicable CE drawing and will not necessarily be longer as stated prior. Additional staking of the cap screw head will be required if contact with the top of the pin is not achieved. | The changes detail the actual corrective action as defined by CE. All staking pins will be inspected for excessive gap. All pins will be checked for depth below the shim surface. Rework staking of pins to ensure contact with the top of the pin will be performed. These changes will preclude recurrence of loose or missing pins. |
| 83-71 | The original report stated there were 366 snubbers total at PVNGS. The updated report provides the exact location of all 366 snubbers including those in the warehouse. | The change details the results of the review conducted to locate the affected snubbers and to update the list of NCR's initiated to properly disposition this deficiency. The corrective action was not impacted. |

DER NO.

SUMMARY OF CHANGE

IMPACT OF CHANGE

Additional NCR's were initiated to document the replacement and return of the identified snubbers to Pacific Scientific and ITT Grinnell.

83-80

Subsequent revisions to this report updated on a continuing basis the steps taken to solve the problem of valve closure time for the FWIV's. During this time period, the MSIV's (same valve design, same valve manufacturer) also failed to close in the specified time period. The corrective action which had been implemented proved inadequate. Due to the similarity of the problems encountered, the description and documentation of corrective actions was transferred to DER 84-50 for final resolution.

The corrective actions outlined in the Final Report proved to be inadequate. DER 84-50 represents the final satisfactory solution to both the FWIV's and MSIV's.

83-81

The original report provided information on how the suspect pipe would be utilized after ultrasonic testing. The following items as noted in the original report have the following dispositions:

- 1) Items 1 through 5, 8 and 12 were 100% ultrasonically tested for thickness and found acceptable;
- 2) Items 6, 7 and 9 were scrapped. New pieces from item 12 were cut and installed in their place;
- 3) Items 10 and 11 were scrapped; and
- 4) Item 13 was rejected and sent back to the manufacturer.

The impact on the final report is not significant. The pipe has now been tested and dispositioned accordingly. The project will inspect only ASME Class I pipe prior to shipment to the jobsite rather than all pipe as stated due to the fact that only ASME Class 1 pipe had deficiencies identified.

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DER NO.

SUMMARY OF CHANGE

IMPACT OF CHANGE

83-83

The original report stated that SCN No. 3573 would be used to conduct training to preclude recurrence. Rather than complete the training, the Project decided that the more correct action to preclude recurrence was to revise WPP 201.0 and WPP/QCI 201.1, via Procedure Change Notices, to include the design size requirement.

The revised report actually had the applicable WPP and WPP/QCI revised to include the design size requirement. This is considered a more prudent action to preclude recurrence.

84-02

The original report stated that the check valves would be verified as operating correctly during system testing. Due to the location of the check valves in the system (between the containment sump and the SI pump suction) this testing could not be performed without filling the containment sump. The Project decided not to do this during testing. Additionally, the slight corrosion of the valve body had no effect on the sealing surface of the check valve. As a result of the above, this action was deleted from the DER.

Since the seating surfaces of the valves were not affected and since the system has successfully been tested this change has no impact on the resolution of this DER.

84-24

The original report cited action to be taken on the valves to verify torque requirements. The revision included the requirement to de-pressurize the system.

The change has no impact on the DER. Expanded instructions will ensure proper disposition of the problem.

84-96

Revision to report specifies that SARC 1288 and 1272 have been initiated to implement necessary changes to the FSAR.

Change only provides additional significant information.

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