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## Arizona Nuclear Power Project

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ANPP-32269-EEVB/WFQ

March 28, 1985

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REGION VIG

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

Attention: Mr. D. F. Kirsch, Acting Director  
Division of Reactor Safety and Projects

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. STN 50-528(License No. NPF-34)/529/530  
Notice of Violation 50-528/84-47/01, Incorrect Weld Location  
for Pipe Support Rear Mounting Brackets.  
File: 85-019-026; D.4.33.2; D.4.02.1

Reference: Letter from D. F. Kirsch, NRC, to E. E. Van Brunt, Jr., ANPP,  
dated January 21, 1985.

Dear Sir:

The above reference letter suggested that it would appear prudent to include statistics in the analysis of the Unit 2 and 3 reinspection program for heavily loaded supports attached to light structural members where the bracket weld orientation problem exists. In this way, the extent of this failure mechanism can be specifically identified.

In response to your concern, Special Construction Inspection Plans (SCIP) 555.0 and 556.0 were previously initiated to reinspect all installed Q pipe support types that utilize rear mounting brackets (e.g., sway struts and mechanical shock suppressors) which are similar to the subject bracket found by the NRC to be non-conforming. Reinspection of these supports is expected to be completed by May 1, 1985, for Unit 2 and June 15, 1985, for Unit 3.

This sample represents 100 percent of the potential nonconforming cases. Results of all nonconformances discovered during the reinspection which are similar to the subject concern (bracket weld orientation) will be analyzed to determine the root cause (failure mechanism).

Our statistical evaluation, including a safety significance analysis, will be complete by July 1985 and available for your review.

We believe this program satisfies the concerns raised by you and should establish that all units are safely constructed. If you should have any further questions or require additional information, please contact me.

Very truly yours,

E. E. Van Brunt, Jr.  
Executive Vice President  
Project Director

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Mr: D. F. Kirsch

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

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