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

SUBJECT: Forwards proposed change to FSAR Figure 9.4-9, "P&I Diagram:
 HVAC-Fuel Bldg." Quality classification for temp elements
 for charcoal filters in fuel bldg essential air handling
 units downgraded to non-Quality Class Q.

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EXTERNAL: LPDR 03	1 1	NRC PDR 02	1 1
NSIC 06	1 1	PNL GRUEL, R	1 1



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Arizona Nuclear Power Project

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

ANPP-32503-EEVB/BJA
April 26, 1985

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528(License No. NPF-34)/529/530
License Condition 2.C.6(c) and 2.C.18(c)
File: 85-056-026; G.1.01.10

- References:
- (1) Letter from E. E. Van Brunt, Jr., ANPP, to G. W. Knighton, NRC, dated December 7, 1984 (ANPP-31380); Subject: PVNGS Seismic Qualification Program.
 - (2) Letter from E. E. Van Brunt, Jr., ANPP, to G. W. Knighton, NRC, dated December 7, 1984 (ANPP-31379); PVNGS Environmental Qualification.
 - (3) NUREG-0857, Supplement No. 7 "Safety Evaluation Report Related to the Operation of Palo Verde Nuclear Generating Station, Units 1, 2, and 3", dated December, 1984.

Dear Mr. Knighton:

Attached is a proposed FSAR change for FSAR Figure 9.4-9. ANPP has re-evaluated the need to have Quality Class "Q" temperature elements for the charcoal filters of the fuel building essential air handling units. These temperature elements provide the operators with an indication of when the charcoal filters are approaching their desorption temperature for radioactive iodine. ANPP has previously determined that there are no ESF filter units at PVNGS that will exceed 200°F following a postulated DBA as a result of a loss of air flow (refer to FSAR Section 1.8, Regulatory Guide 1.52, Position C.3.K). The concern of ANSI/ASME N509-1976 is that desorption of iodine may occur at elevated temperatures (e.g., >300°F). Therefore, the desorption temperature will not be reached in the charcoal filters of the fuel building essential air handling units and there is no need to have temperature elements to monitor the charcoal bed temperature. For these reasons, the quality classifications for the four temperature elements have been downgraded from Quality Class "Q" to non-Quality Class "Q".

Reference (1) submitted a Justification for Interim Operation (JIO) for PVNGS Unit 1 in order to complete the seismic qualification of these four temperature elements which are located adjacent to the charcoal filters of the fuel building essential air handling units. Additionally, Reference (2) submitted a JIO in order to complete the environmental qualification of these same four temperature elements. These JIO's are discussed in Sections 3.10 and 3.11 of Reference (3) and the staff has imposed License Condition 2.C.6(c) and 2.C.18(c) for the temperature elements to be seismically and environmentally qualified prior to PVNGS Unit 1 initial criticality. The JIO's of References (1) and (2) stated that the function of these temperature elements is to alert the control room operator of potential filter fires. This stated function was in error. The actual function of the temperature elements is to provide the operators with an indication of when the charcoal filters

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Mr. George W. Knighton
License Condition 2.C.6(c) and 2.C.18(c)
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are approaching their desorption temperature for radioactive iodine. Since it has been determined that non-Quality Class "Q" equipment is acceptable for use in this application, the temperature elements have been removed from the scope of the Equipment Qualification Program. These temperature elements are considered to be fully qualified for their application at PVNGS.

If you have any questions on this matter, please contact W. F. Quinn of my staff.

Very truly yours,



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

EEVB/BJA/mb
Attachment

cc: E. A. Licitra (All w/attachment)
H. Garg
A. C. Gehr
R. P. Zimmerman

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STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Executive Vice President, Arizona Nuclear Power Project, 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 26th day of April, 1985.

Irene C. Clausen
Notary Public

My Commission Expires:

My Commission Expires Nov. 12, 1988

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