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 FACIL: STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Public 05000528
 AUTH. NAME: AUTHOR AFFILIATION
 VAN BRUNT, E. E. Arizona Nuclear Power Project (formerly Arizona Public Serv
 RECIP. NAME: RECIPIENT AFFILIATION
 DENTON, H. Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests partial scheduler exemption from GDC 4 re
 protection of structures, sys & components from dynamic
 effects of postulated pipe breaks until completion of
 second refueling outage.

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NOTES: Standardized plant.
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Arizona Nuclear Power Project

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ANPP 33985 EEVB/WFQ

November 13, 1985

Mr. Harold Denton
Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington D.C. 20555

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Docket No. STN-50-528 (License NPF-41)
Request for Partial Scheduler Exemption to GDC 4
File: 85-056-026; G.1.01.10

- References:
- (A) Letter from E. E. Van Brunt, Jr., ANPP, to G. W. Knighton, NRC, dated June 7, 1984 (ANPP-29684)
 - (B) Letter from E. E. Van Brunt, Jr., ANPP, to G. W. Knighton NRC, dated December 10, 1984 (ANPP-31417)
 - (C) Letter from E. E. Van Brunt, Jr., ANPP, to G. W. Knighton NRC, dated July 16, 1985 (ANPP-33037)
 - (D) NRR Report "Safety Evaluation Report on the Elimination of Large Primary Loop Responses as a Design Basis", dated October 11, 1984, Docket No. STN-50-470

Dear Mr. Denton:

As provided by 10CFR50.12(a), reference (A) submitted APS' request for a partial exemption for PVNGS Units 1, 2 and 3 from the provisions of General Design Criterion (GDC) 4. Based on the application of advanced fracture mechanics, APS specifically requested exemption from those portions of GDC 4 which require protection of structures, systems, and components against certain dynamic effects associated with postulated Reactor Coolant System (RCS) main loop pipe breaks. Subsequent to the submittal of reference (A), as documented in reference (B), APS was advised informally by the NRR staff that the exemption request was denied for Unit 1. Also, APS was requested to submit a request for amendment of the construction permits for Units 2 and 3, rather than utilize the exemption process.

Subsequent to the submittal of reference (B), as documented in reference (C), APS was informally advised by the NRC staff that an exemption from GDC 4 could not be granted for the life of the units. To allow processing of the application to amend the construction permits, a scheduler exemption request until the end of the second refueling outage would be needed. Reference (C) provided such a request.

The need to perform extensive work on the Unit 1 RCS pipe whip restraints to comply with GDC 4 has been recently identified. As provided by 10CFR50.12(a), Arizona Public Service Company hereby requests for PVNGS Unit 1 a partial exemption from the provisions of GDC 4, as requested and justified for PVNGS Units 2 and 3 in reference (A), for a period ending with the completion of the second refueling outage. Additionally, this exemption would result in a radiation reduction to plant personnel of 10 man-rem, eliminate the need for an outage of at least 18 days, and save 7000 man-hours. This scheduler exemption should

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be sufficient to allow the completion of the rulemaking process on this subject.

Reference (D) is the NRR staff evaluation of the C-E report entitled, "Basis for Design of Plant Without Pipe Whip Restraints", which provided the technical bases for eliminating large ruptures of the RCP as a design basis for C-E System-80 plants. The NRR report states:

"The staff concludes that the probability or likelihood of large pipe breaks occurring in the primary coolant system loop of a CESSAR facility is sufficiently low such that protective devices associated with postulated pipe breaks in the CESSAR primary coolant system need not be installed."

The C-E analysis was performed using the PVNGS design, which assures that the as-built design for PVNGS Unit 1 agrees with the design described in the C-E analysis. This analysis is discussed in detail in reference (B).

APS does not plan to remove the Unit 1 RCS pipe whip restraints if the exemption is granted. APS will also request an emergency amendment to License NPF-41 to reflect this exemption. Your timely consideration of this matter is most appreciated.

If you have any questions or require additional information, please contact Mr. W. F. Quinn of my staff.

Very truly yours,

EE Van Brunt Jr. /JH

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

EEVB/WFQ/PGN/rw

cc: G. W. Knighton
E. A. Licitra
R. P. Zimmerman
A. C. Gehr



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