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FACIL:STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
AUTH.NAME AUTHOR AFFILIATION
VAN BRUNT,E.E. Arizona Nuclear Power Project (formerly Arizona Public Serv
RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director (pre-851125)

SUBJECT: Advises that design,const & preoperational testing essentially complete w/noted exceptions.Facility expected to be operationally ready to commence process leading to fuel loading on 851202.List of schedular exemptions encl.

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Arizona Nuclear Power Project
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November 22, 1985
ANPP-34083-EEVB/WFQ

Dr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 2
Certification Regarding the Design, Construction and Pre-Operational Testing of Palo Verde Nuclear Generating Station Unit 2
Docket No. STN 50-529
File: 85-056-026; G.1.01.10

Reference: (1) Letter from D. G. Eisenhut, NRC, to E. E. Van Brunt, Jr., APS, dated February 24, 1983; Subject: Certification Regarding the Design and Construction of the Palo Verde Nuclear Generating Stations, Units 1, 2 and 3
(2) Letter from E. E. Van Brunt, Jr., APS, to G. W. Knighton, NRC, dated November 14, 1984; Subject: FSAR Update

Dear Dr. Denton:

Arizona Public Service Company (APS), the applicant for an operating license for Palo Verde Nuclear Generating Station (PVNGS) Unit 2, wishes to advise you that design, construction, and pre-operational testing are essentially complete except as noted herein and that we expect Unit 2 and the operating organization to be operationally ready on December 2, 1985, to commence the process leading to the fuel loading of the unit in accordance with the Technical Specifications for Unit 2:

A. FSAR and Licensing Commitments Status

10 CFR Part 50.71(e) recognizes that the FSAR is a living document subject to periodic updating to conform the plant description set forth therein to its actual state at any point in time. To the best of our knowledge, Reference 2 identified the known changes necessary to update the FSAR to conform to a current status. Future discrepancies will be handled in a manner compatible with 10 CFR Part 50.59.

B001
1/1

B. Remaining Work Items

The open item tracking systems in use at Palo Verde identify and track completion of outstanding hardware deficiencies, test deficiencies disclosed during pre-operational testing, inspection issues and other items requiring resolution. Entries are reviewed and classified so as to identify restraints to plant operational modes. Outstanding items currently on the tracking systems are typical of an operating plant in both number and scope. Those items classified as restraints to fuel load will be closed out or dispositioned prior to commencement of fuel load. Similarily, items classified as restraints to any of Operational Modes 5 through 1 will be closed out or dispositioned before operation in such mode is commenced.

C. Items Not Complete for Which Schedular Exemptions Have Been Submitted

Items required by the FSAR, other licensing commitments or other regulatory requirements which will not be completed by fuel load of Unit 2 are listed in Attachment 1. Requests for schedular exemption and/or justifications for interim operation respecting such items have been submitted.

D. Preoperational Tests

Attachment 2 lists those Phase I (preoperational) tests which will be performed after initial fuel load per FSAR 14.2.5.

To the best of my knowledge, the foregoing addresses the remaining activities and items which bear upon your issuance of an operating license authorizing fuel loading and low power operation of Palo Verde Unit 2. In summary, with the completion of such items as noted, except where schedular exemptions are

appropriate, I presently expect that we will be ready to commence the process leading to the fuel loading of Palo Verde Unit 2 on December 2, 1985. Accordingly, we request that a forty year operating license be issued on December 2, 1985.

Very truly yours,

E. E. Van Brunt

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

EEVB/WFQ/dlm
Attachment

cc: Mr. John B. Martin, Administrator
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

R. P. Zimmerman
E. A. Licitra
G. W. Knighton
F. Moraglia
D. Canady
A. C. Gehr
J. R. Bynum

ATTACHMENT 1

Schedular Exemptions

SUBJECT	ANPP LETTER #	DATE
Supplement 1 to NUREG-0737	33965	November 8, 1985
Equipment Qualification	33605	September 30, 1985
Post Accident Sampling System	33573	September 26, 1985
Pressurizer Vent Valve (RC-108)	34078	November 22, 1985
Auxiliary Spray System Modifications	33713, 33771	October 15, 22, 1985
Auxiliary Spray System Modifications	33905	November 4, 1985
ATWS	33712	October 12, 1985

ATTACHMENT 2

TESTS TO BE PERFORMED AFTER INITIAL FUEL LOAD
(To Be Performed Per FSAR 14.2.5 Phase I Tests)

The Following Tests Have Not Been Performed

91PE-2LR02	Liquid Radwaste Evaporator Test
92PE-2QF06	In Plant Communications (Safety Frequency Radio Frequency)
92PE-2SB20	DNBR Calculator to PMS Data Link
92PE-2SQ01	Radiation Monitoring Preop
92PE-2SQ02	Post Accident Radiation Monitor
92PE-2SQ03	Digital Radiation Monitoring System
92PE-2SQ04	Safety Related Radiation Monitoring
91PE-2SS02	Gas Analyzer Test
93PE-2QD02	Modular Emergency Lighting Units

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

Edwin E. Van Brunt, Jr.

Sworn to before me this 22 day of November, 1985.

Nora E. Meader

Notary Public

My Commission Expires:

My Commission Expires April 6, 1987