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 KNIGHTON, G.W. PWR Project Directorate 7

SUBJECT: Forwards justification for interim operation until
 containment water level instrumentation surveillance tested.
 Surveillance test will not be performed prior to fuel load
 due to design change.

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DO hereby certify that
[Name] is a citizen of the United States of America.

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of the United States of America at [City], [State], this [Day] day of [Month], 19[Year].

Signature of [Name]
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Arizona Nuclear Power Project

P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

November 27, 1985
ANPP 34123 EEVB/JKO

Director of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Project, Director
PWR Project Directorate #7.
Division of Pressurized Water Reactor Licensing - B
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 2
Docket No. STN-50-529
Justification for Interim Operation for
Containment Water Level Instrumentation
File: 85-056-026

Dear Mr. Knighton:

The attachment provides a justification for interim operation for PVNGS Unit 2 until the containment water level instrumentation can be surveillance tested. A surveillance test will be used instead of a preoperational test to demonstrate the operability.

In the PVNGS TMI - Lessons Learned Implementation Report (LLIR), item II.F.1.5, ANPP committed to have the instrumentation for containment water level pre-operationally tested prior to fuel load. Due to a design change that affects the surveillance test, the test will not be performed prior to fuel load. We would like to request an exception to the previous commitment until Mode 3. Mode 3 is when the instrumentation is required per the Technical Specifications. Attached is a justification for interim operation.

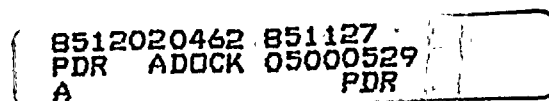
If you have any further questions, please contact Mr. W. F. Quinn of my staff.

Very truly yours,

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

EEVB/JKO/rw
Attachment

cc: E. A. Licitra
M. Ley
R. P. Zimmerman
R. C. Sorenson
A. C. Gehr
J. B. Martin



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Attachment 1

JUSTIFICATION FOR INTERIM OPERATION

TAG NUMBERS

DESCRIPTION

PROJECTED COMPLETION

SI-706 A&B
SI-707 A&B

INSTRUMENTATION INDICATING THE
CONTAINMENT WATER LEVEL

PRIOR TO INITIAL MODE
3 ENTRY

HISTORY:

A design change affecting the surveillance test for the containment water level instrumentation is not complete and will not be completed prior to fuel load. A surveillance test will be done instead of a preoperational test to demonstrate the operability of the instruments. Surveillance requirements of the Technical Specification adequately determines operability. A functional test of the instrumentation has been completed. This instrumentation was committed to in the PVNGS LLIR II.F.1.5 and is also a Regulatory Guide 1.97 Revision 2 instrument.

JUSTIFICATION FOR INTERIM OPERATION:

These instruments are wide-range instruments used for monitoring the containment water level. They are required by the Technical Specification by Mode 3. There are narrow-range containment water level instruments that have been pre-operationally tested and can provide indication of rising water level inside containment. With a new core there is no decay heat prior to initial Mode 3 entry, therefore, this issue has no safety significance. Other instruments are available to further investigate any accident-type situation that may occur.

