

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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

SUBJECT: Provides justification for interim operation of reactor
 coolant gas vent sys until entry into Mode 4. Valve will be
 tested prior to Mode 4 & during post-core not functional
 testing. Exception to commitment re NUREG-0737 II.B.1 noted.

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NOTES: Standardized plant.

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	PWR-B PD7 LA	1 0	LICITRA, E 01	1 1
INTERNAL:	ACRS 41	6 6	ADM/LFMB	1 0
	ELD/HDS3	1 0	IE FILE	1 1
	IE/DEPER/EPB 36	1 1	IE/DGAVT/QAB21	1 1
	NRR BWR ADTS	1 1	NRR PWR-A ADTS	1 1
	NRR PWR-B ADTS	1 1	NRR ROE, M. L	1 1
	NRR/DHFT/HFIB	1 1	NRR/DHFT/MTB	1 1
	NRR/DSRO DIR	1 1	NRR/DSRO/RRAB	1 1
	<u>REG FILE</u> 04	1 1	RGN5	3 3
	RM/DDAMI/MIB	1 0		
EXTERNAL:	24X	1 1	BNL (AMDTs ONLY)	1 1
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Arizona Nuclear Power Project

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ANPP-34078/EEVB/JKO

November 22, 1985

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 of
Reactor Coolant Gas Vent System
File: 85-056-026; G.1.01.10

Dear Mr. Knighton:

The attachment to this letter is a justification for interim operation of the Reactor Coolant Gas Vent System until initial entry into Mode 4.

A valve in the system was inoperable during pre-core hot functional testing, so we have scheduled to test the valve prior to Mode 4 under the requirements of ASME Section XI test program. This type of testing will also meet the surveillance requirements of any potential technical specification. Additionally, we also plan to test the valve during the post-core hot functional testing. This takes exception to PVNGS commitment concerning NUREG 0737 II.B.1, which is to have the system operable prior to fuel load. The remainder of the system has been preoperationally tested.

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

Very truly yours,

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

EEVB/WFQ/JKO/rw
Attachment

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

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PDR ADOCK 05000529
A PDR

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Attachment 1

JUSTIFICATION FOR INTERIM OPERATION

Valve Number	Description	Projected Completion
HV-108	Valve on Train B from the pressurizer in the Reactor Coolant Gas Vent System	Prior to initial Mode 4

History:

During the Reactor Coolant Gas Vent System preoperational test, valve HV-108 failed to operate properly. It was written up as a test exception and scheduled for testing per the requirements of the ASME Section XI test program prior to initial Mode 4 entry. Additional testing under the correct Reactor Coolant System temperature and pressure will be done during the post-core hot functional testing (PCHFT) phase.

Justification for Interim Operation:

The valve will be tested prior to initial Mode 4 entry. It is not possible to produce non-condensable gases in an accident situation prior to initial criticality. The valve will be tested per the requirements of ASME Section XI test program prior to initial entry into Mode 4. Proper Reactor Coolant System temperature and pressure for the testing of the valve will be reached during PCHFT and will be further tested at this time. This valve is on Train B path. Should the system be required prior to initial criticality, Train A is available.

