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 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  
 KNIGHTON, G. W. PWR Project Directorate 7

SUBJECT: Requests 2-day relief from Limiting Conditions for Operation  
 3.0.3 & 4 re & operational mode, respectively, to remain at  
 power while emergency Tech Spec change prepared to allow  
 charcoal filter testing, per ANSI N509-1980.

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## Arizona Nuclear Power Project

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

August 1, 1986

ANPP-37657-EEVB/JRP/98.05

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)  
Units 1 and 2  
Docket Nos. STN 50-528 (License NPF-41)  
STN 50-529 (License NPF-51)  
Request for Relief from a Limiting Condition for Operation  
File: 86-F-005-419.05; 86-056-026

Dear Mr. Knighton:

Per conversation with you and your staff on August 1, 1986, submitted herewith is a one-time only request for a waiver for two (2) working days relief from Limiting Condition for Operation 3.0.3 for Unit 1; which states in part "when a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within 1 hour, action shall be initiated to place the unit in a MODE in which the specification does not apply by placing it; as applicable, in: . . .," and Limiting Condition for Operation 3.0.4 for Unit 2; which states in part "Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements."

The requested relief will allow PVNGS to remain at power while an Emergency Technical Specification change is prepared to allow testing of the charcoal filter units in accordance with ANSI N509-1980 instead of the currently required ANSI N509-1976.

During a review of documentation prior to installation of the PVNGS Unit 3 charcoal filter beds, it was discovered that the charcoal did not fully meet the requirements of ANSI N509-1976. This condition was evaluated for its effect on the charcoal filters installed in PVNGS Units 1 and 2. The evaluation determined that the charcoal filters installed in Units 1 and 2 did not meet the ANSI N509-1976 requirements with regard to radioiodine removal efficiency. Technical Specification Surveillance requirement 4.7.7.c requires radioiodine removal efficiency testing in accordance with ANSI N509-1976.

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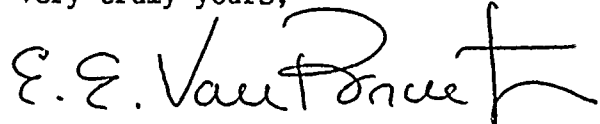
Mr. George W. Knighton  
Request for Relief from Limiting Condition for Operation  
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Continued operation of the PVNGS units will not result in a unsafe condition as the existing charcoal filters meet the testing requirements of ANSI N509-1980. This standard has been accepted by the NRC and the acceptance is documented in Section 6.5.1 of the Standard Review Plan (NUREG-0800).

By copy of this letter, we have informed the Arizona Radiation Regulatory Agency of the request.

Appropriate fees will be provided in a followup letter. Your prompt response is requested.

Very truly yours,

A handwritten signature in dark ink, appearing to read "E. E. Van Brunt, Jr.", with a stylized flourish at the end.

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

EEVB/JRP/rw  
Attachment

cc: O. M. De Michele  
J. G. Haynes  
R. P. Zimmerman  
A. C. Gehr  
C. F. Tedford, Director ARRA  
E. A. Licitra  
Director Region V, USNRC

