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 FACIL: STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Public Service 05000529
 AUTH. NAME: OVERBECK, G.R. AUTHOR AFFILIATION: Arizona Public Service Co. (formerly Arizona Nuclear Power)
 RECIP. NAME: RECIPIENT AFFILIATION: Records Management Branch (Document Control Desk)

SUBJECT: Informs that repairs to plant EDG 2A jacket water cooling sub-sys were completed & EDG was declared operable on 990903 at approx 21:45 MST. NOED was not necessary, since 72 hour completion time was met.

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Palo Verde Nuclear
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102-04343 - GRO/SAB/DGM
September 8, 1999

U. S. Nuclear Regulatory Commission
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Reference: 1. APS Letter 102-04341-GRO/SAB/REB, Enforcement Discretion to
Technical Specification Section 3.8.1, "AC Sources - Operating", dated
September 3, 1999.

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 2
Docket No. STN 50-529
Enforcement Discretion to Technical Specification
Section 3.8.1, "AC Sources - Operating"**

On September 3, 1999, Arizona Public Service Company (APS) requested enforcement discretion to Technical Specification Section 3.8.1, "AC Sources - Operating". The Nuclear Regulatory Commission granted a verbal notice of enforcement discretion at approximately 18:10 MST on September 3, 1999. The enforcement discretion allowed, on a one-time basis, extension of the Completion Time in Required Action B.4 of Technical Specification 3.8.1 from 72 hours to 108 hours. APS submitted a written follow-up (reference 1) on September 3, 1999.

The revised completion time was requested to allow repairs to be completed on Unit 2 emergency diesel generator 2A. The Unit 2 emergency diesel generator (EDG) 2A had developed a leak in the jacket water sub-system that was large enough to affect the operation of the EDG. The EDG had previously been removed from service on September 1, 1999 at 0447 MST to repair a problem with the 3R cylinder and was being run to perform testing when the leak developed. A review of the required work scope determined that it could take an additional 1.5 days to repair the EDG and return it to an operable status. This would have exceeded the 72-hour completion time in required action B.4 of Technical Specification 3.8.1. Therefore, the Palo Verde Technical Specifications would require a plant shutdown prior to completing the repairs on EDG 2A.

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Enforcement Discretion to Technical Specification
Section 3.8.1, "AC Sources - Operating"

The repairs to the Unit 2 emergency diesel generator 2A jacket water cooling sub-system were completed, and the EDG declared OPERABLE on September 3, 1999 at approximately 21:45 MST. The action statement did not expire until September 4, 1999 at 04:47 MST, therefore, the 72 hour completion time was met and the NOED was not necessary. Even though the enforcement discretion was not needed, at the time of the request APS could not predict the extent of repairs that would be necessary to correct the EDG jacket water leak. APS acknowledges and appreciates the effort expended to grant the discretion.

No commitments are being made to the NRC by this letter.

Should you have any questions, please contact Dan Marks at (623) 393-6492.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dan Marks", is written in black ink.

GRO/SAB/DGM/kg

cc: E. W. Merschoff
P. H. Harrell
N. Kalyanam
J. H. Moorman

