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 Document Control Branch (Document Control Desk)

SUBJECT: Forwards change to FSAR re initial test program, revising  
 preoperational test method for holdup subsystem of chemical  
 & vol control sys.

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## Arizona Nuclear Power Project

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Docket Nos. STN 50-528/529/530

October 8, 1987  
161-00561-JGH/BJA

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2 and 3  
Change to the Initial Test Program  
File: 87-A-056-026; 87-A-005-419.05

In accordance with the provisions of the applicable license conditions of the Unit 1, 2 and 3 Operating Licenses, ANPP is submitting the attached change to the initial test program which is described in the PVNGS FSAR and in CESSAR. The change revises the preoperational test method for the holdup subsystem of the Chemical and Volume Control System (CVCS). The change provides for greater flexibility in obtaining the necessary test data and will not result in the disposal of large amounts of treated water during performance of the test. This change has been reviewed in accordance with the provisions of 10 CFR 50.59 and ANPP has determined that this change does not involve an unreviewed safety question. The holdup subsystem is a non-safety related portion of the CVCS that is not credited for any accident mitigation or prevention functions.

If you have any additional questions on this matter, please contact Mr. W. F. Quinn of my staff.

Very truly yours,

J. G. Haynes  
Vice President  
Nuclear Production

JGH/BJA/rw  
Attachment

cc: O. M. De Michele (all w/a)  
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ATTACHMENT  
(FSAR CHANGE PAGE)

1.9.2.4 -- Holdup Subsystems Test (CESSAR Section 14.2.12.1.15)

CESSAR Section 14.2.12.1.15 specifies the following as a test method for the Holdup Subsystem preoperational test:

- 3.1 Fill the holdup tank and observe level indications and alarms.
- 3.2 Simulate holdup tank temperature and observe indications and alarms.
- 3.3 Using each holdup pump, drain the holdup tank to the boric acid concentrator. Observe holdup tank level indications, alarms and interlocks and holdup pump discharge pressure.
- 3.4 Refill and isolate the holdup tank. Open the holdup tank recirculation valves and start each holdup pump. Observe tank level. Lineup the holdup pumps to the reactor drain tank filter and observe holdup tank level.

This CESSAR specified test method precludes the capability to adjust for plant conditions at the time of testing and also does not address the site specific need to conserve treated water at PVNGS. Therefore, the following modification to the CESSAR test description is utilized:

- 2.5 There is a sufficient inventory of water contained in the holdup tank to conduct testing in accordance with Section 3.0.
- 3.0 Test Method
- 3.1 Observe level indication, alarms, and interlocks in response to actual or simulated holdup tank levels.
- 3.2 Simulate holdup tank temperature and observe indications and alarms.
- 3.3 Using each holdup pump, transfer holdup tank contents to the boric acid concentrator. Observe holdup tank level indication, alarms and interlocks and holdup pump discharge pressure.
- 3.4 Refill and isolate the holdup tank. Open the holdup tank recirculation valves and start each holdup pump. Observe tank level. Lineup the holdup pumps to the reactor drain tank filter and observe holdup tank level.

