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 VAN BRUNT,E.E. Arizona Nuclear Power Project (formerly Arizona Public Serv  
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SUBJECT: Responds to Generic Ltr 88-05 re boric acid corrosion of carbon steel reactor pressure boundary components in PWRs.

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## Arizona Nuclear Power Project

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161-01058-EEVB/ACR/JMQ  
May 27, 1988

Docket Nos. STN 50-528/529/530

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Mail Station P1-137  
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Reference: Letter from F. Miraglia, NRR, to All Licensees  
of Operating PWRs and Holders of Construction  
Permits for PWRs, dated March 17, 1988  
Subject: Generic Letter 88-05

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station  
Units 1, 2 and 3  
Generic Letter 88-05 Boric Acid Corrosion  
of Carbon Steel Reactor Pressure Boundary  
Components In PWR Plants  
File: 88-005-026; 88-010-026

The referenced letter requested a response to provide assurances that a Boric Acid Corrosion Program is in place or a schedule for implementing such a program if one is not in place. The referenced letter further describes what the program should entail.

ANPP is addressing Generic Letter 88-05 in the following manner:

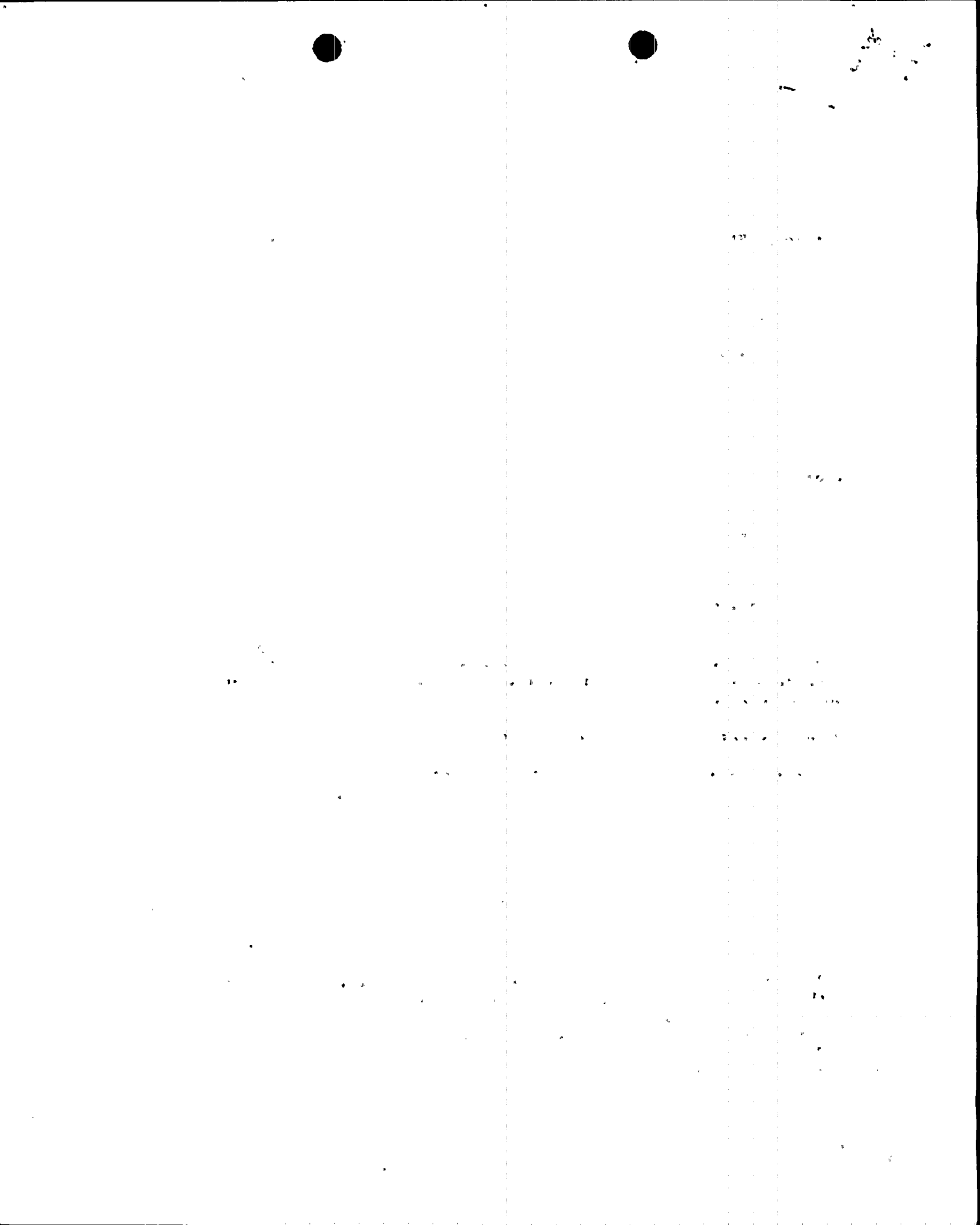
- (1) A determination of the principal locations where leaks that are smaller than the allowable technical specification limit can cause degradation of the primary pressure boundary by boric acid corrosion. Particular consideration should be given to identifying those locations where conditions exist that could cause high concentrations of boric acid on pressure boundary surfaces.

ANPP RESPONSE: ANPP will determine principal locations where a small leak can cause degradation of primary pressure boundaries by boric acid corrosion.

- (2) Procedures for locating small coolant leaks (i.e., leakage rates at less than technical specification limits). It is important to establish the potential path of the leaking coolant and the reactor pressure boundary components it is likely to contact. This information is important in determining the interaction between the leaking coolant and reactor coolant pressure boundary materials.

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ANPP RESPONSE: Procedures will be revised or written to incorporate the list of potential leak locations as determined by item 1, for visual inspections on a routine basis. It will also state the need to determine not only the source of the leakage but also the path taken by the leaking fluid.

- 3) Methods for conducting examinations and performing engineering evaluations to establish the impact on the reactor coolant pressure boundary when leakage is located. This should include procedures to promptly gather the necessary information for an engineering evaluation before the removal of evidence of leakage, such as boric acid crystal buildup.

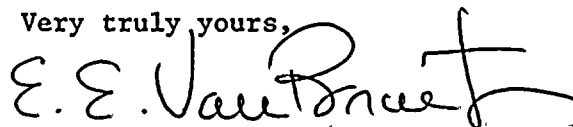
ANPP RESPONSE: The appropriate procedures will be revised to include provisions for conducting examinations and performing engineering evaluations to establish the impact on the reactor coolant pressure boundary when a leak is located.

- (4) Corrective actions to prevent recurrences of this type of corrosion. This should include any modifications to be introduced in the present design or operating procedures of the plant that (a) reduce the probability of primary coolant leaks at the locations where they may cause corrosion damage and (b) entail the use of suitable corrosion resistant materials or the application of protective coatings/claddings.

ANPP RESPONSE: The corrective actions will be determined upon the results of the engineering evaluations performed in part 1 and may entail the use of suitable corrosion resistant materials, the application of protective coatings/claddings, or modifications to designs or operating procedures.

The program is scheduled to be implemented by September 30, 1988. If you have any questions, please contact Mr. Carter Rogers of my staff.

Very truly yours,



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


EEVB/ACR/JMQ/pvk

cc: J. B. Martin  
E. A. Licitra  
A. C. Gehr  
T. J. Polich

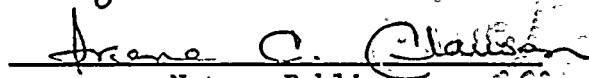


STATE OF ARIZONA )  
 ) ss.  
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Executive Vice President Project Director of Arizona Nuclear Power Project, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority to do so, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true.

  
Edwin E. Van Brunt, Jr.

Sworn to before me this 27<sup>th</sup> day of May, 1988.

  
Notary Public

My Commission Expires:

My Commission Expires Nov. 12, 1988

