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ACCESSION NBR: 8806290010 DOC. DATE: 88/06/17 NOTARIZED: NO DOCKET #  
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 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529  
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530  
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 Document Control Branch (Document Control Desk)

SUBJECT: Forwards addl info re Violations 1, 2 & 3 per NRC request.

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 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES: Standardized plant. 05000528  
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## Arizona Nuclear Power Project

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161-01126-EEVB/BJA

June 17, 1988

Docket Nos. STN 50-528/529/530

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, D.C. 20555

- References: (1) Letter from R. J. Pate, NRC, to E. E. Van Brunt, Jr., ANPP, dated March 17, 1988. Subject: Violations Identified During Inspection Nos. 50-528/87-37; 50-529/87-36; 50-530/87-38.
- (2) Letter from E. E. Van Brunt, Jr., ANPP, to USNRC Document Control Desk dated April 15, 1988 (161-00951). Subject: Response to Notice of Violation: 50-528/87-37, 50-529/87-36 and 50-530/87-38.

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2 and 3  
Additional Information on Notice of Violation  
File: 88-A-056-026

Reference (2) provided ANPP's response to the Notice of Violation transmitted to ANPP by Reference (1). Subsequent to the ANPP response, the NRC has requested additional information on three of the items discussed in this response. The requested information is provided in the attachment to this letter. This submittal supplements our previous response of Reference (2).

If you have any additional questions on this matter, please contact Mr. A. C. Rogers at (602) 371-4041.

Very truly yours,

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

EEVB/BJA/dlm  
Attachment

cc: J. B. Martin (all w/a)  
T. J. Polich  
G. W. Knighton  
M. J. Davis  
A. C. Gehr

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#### ADDITIONAL INFORMATION ON VIOLATION 1

This violation concerns the discrepancy identified during the inspection of Limitorque operators inside the containment building of PVNGS Unit 1. Specifically, valve SIA-UV-673 had a grease fitting in a grease relief. The NRC comment on the ANPP response of Reference (2) was that the response did not adequately address the steps that will be taken to prevent future occurrences of this type. In response to this NRC concern, ANPP intends to revise the preventive maintenance procedure for motor operators. The revision to the procedure is contingent upon receiving detailed information from the vendor as to what the required configuration of the grease relief valves is. Discussions have been initiated with the vendor to obtain the necessary clarification. It is envisioned that the revised preventive maintenance procedure will include a step to verify that the grease relief valves are in the proper configuration as specified by the vendor.

#### ADDITIONAL INFORMATION ON VIOLATION 2

The specific concern raised by the NRC auditors during the equipment qualification audit was that the split jackets on the Anaconda flex conduit could allow moisture ingress into the conduit which could then condense and form a column of water above the Electrical Conduit Seal Assembly (ECSA). The NRC auditors noted that the Conax ECSAs are not qualified for submergence. In response to this concern, ANPP replied (Reference (2)) that a qualification program has been initiated at Conax to qualify the Conax ECSAs for post-accident submergence. Subsequent to ANPP's response, the NRC identified an additional concern that ECSAs other than those manufactured by Conax might have been used with the Anaconda flex conduit. In response to this concern, ANPP's Engineering Department conducted a review of the equipment qualification files. The review indicated that several Rosemount pressure transmitters located inside containment utilized an ECSA other than Conax. The Rosemount transmitters are supplied with their own ECSAs designated as Rosemount Model No. 353C. The Rosemount ECSAs were the only instance where an ECSA other than Conax was identified as being used with 50.49 equipment.

In conversations between ANPP and Rosemount, Rosemount informed ANPP that the Model 353C conduit seals have been qualified for post-accident submergence. Rosemount conducted a two week post-LOCA submergence test that is documented in Rosemount Report Nos. D8400336 and D8400177. These reports have been obtained by ANPP.

#### ADDITIONAL INFORMATION ON VIOLATION 3

This violation involves the environmental qualification of nylon insulated wire connectors installed in Limitorque motor operators with dual-voltage AC motors. The NRC originally identified a problem with material traceability of the nylon wire connectors during an audit at the Limitorque facility in June, 1987. During the NRC's Equipment Qualification team inspection at ANPP in November, 1987, the NRC informed ANPP that the Limitorque material traceability concern was applicable to PVNGS. The NRC stated that

qualification of the Limitorque motor operators with dual-voltage AC motors was indeterminate because of the nylon wire connectors. In response to this concern, ANPP committed to replace the nylon wire connectors with environmentally qualified AMP butt splices and Raychem heat shrink sleeves.

Following ANPP's response to the violation (Reference (2)), the NRC questioned whether ANPP had reviewed other uses of nylon insulated wire connectors in other electrical equipment which is required to be qualified by 10CFR50.49. ANPP does not believe that further review of the equipment qualification files is necessary due to the nature of the identified discrepancy. The NRC identified a material traceability problem with one vendor (Limitorque). There is no evidence to suggest that this material traceability problem with nylon insulated wire connectors is applicable to other manufacturers of electrical equipment. Nor is there any test data that suggests that these nylon wire connectors may not be capable of surviving the post-accident environments at PVNGS. ANPP believes that all other uses of nylon insulated wire connectors (i.e., other than Limitorque) have been adequately qualified by their separate qualification programs and no further action is required by ANPP at this time.