

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8810270314 DOC. DATE: 88/10/18 NOTARIZED: NO DOCKET #
 FACIL: STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530
 AUTH. NAME AUTHOR AFFILIATION
 KARNER, D. B. Arizona Nuclear Power Project (formerly Arizona Public Serv
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Confirms 881014 telcon between C Rogers & GW Knighton re
loss of offsite power testing.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: OR Submittal: General Distribution

NOTES: Standardized plant.

05000530

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL		RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD5 LA	1 0		PD5 PD	2 2
	CHAN. T	1 1		DAVIS, M	1 1
INTERNAL:	ACRS	6 0		ARM/DAF/LFMB	1 0
	NRR/DEST/ADS 7E	1 1		NRR/DEST/CEB 8H	1 1
	NRR/DEST/ESB 8D	1 1		NRR/DEST/MTB 9H	1 1
	NRR/DEST/RSB 8E	1 1		NRR/DOEA/TSB 11	1 1
	NRR/PMAS/ILRB12	1 1		NUDACS-ABSTRACT	1 1
	OGC/HDS1	1 0		<u>REG FILE</u> 01	1 1
	RES/DSIR/EIB	1 1			
EXTERNAL:	LPDR	1 1		NRC PDR	1 1
	NSIC	1 1			
NOTES:		1 1			

TOTAL NUMBER OF COPIES REQUIRED: LTTR 27 ENCL 24

MAW

[illegible]

1. 1950年10月1日，中华人民共和国成立，标志着中国历史进入了一个新的纪元。

100-443887-100

[illegible][illegible]



Arizona Nuclear Power Project

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

161-01397-DBK/ACG
October 18, 1988

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

- References:
1. Letter from J. G. Haynes, ANPP, to NRC, ANPP letter 161-00474, dated August 31, 1987. Subject: Changes to Initial Test Program.
 2. Letter from E. E. Van Brunt, ANPP, to NRC, ANPP letter 161-00887, dated March 17, 1988. Subject: Loss of Offsite Power Testing.
 3. Letter from E. E. Van Brunt, ANPP, to NRC, ANPP letter 161-01105, dated June 13, 1988. Subject: Loss of Offsite Power Testing.
 4. Letter from Michael J. Davis, Project Manager, Project Directorate V, Division of Reactor Projects - III, IV and V and Special Projects, dated September 29, 1988. Subject: Changes to Palo Verde 3 Initial Test Program (TAC No. 67076).

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 3
Loss of Offsite Power Testing
File: 88-001-419.01; 88-056-026

This letter confirms the October 14, 1988 telephone call between Carter Rogers and G. W. Knighton during which Mr. Rogers requested an informal appeal of the staff's conclusion stated in Reference 4 that the integrated systems Loss of Offsite Power (LOOP) test is required to be conducted on Palo Verde Unit 3 and its denial of ANPP's proposal to delete such test on Unit 3.

It is our position that such conclusion is based on a misconception that ANPP was proposing to substitute individual system and systems tests for the integrated test provided for by Regulatory Guide (RG) 1.68 Rev. 2, Appendix A, Section 5.j.j. That is not the case. Rather, the proposed deletion of the LOOP test on Unit 3 is based upon the satisfactory completion of such LOOP test on both Palo Verde Unit 1 and Unit 2. Because (i) Unit 3 is built to the same standard design and has the same or similar equipment as Units 1 and 2, (ii) the standard design and construction of all three units has been confirmed by similar responses to transients experienced on all units, (iii) the capability of PVNGS to cope with station blackouts is demonstrably good, and (iv) the operability of individual, electric systems and subsystems have been tested and found to be operable, it is ANPP's position that the deletion of the integrated

8810270314 881018
PDR ADOCK 05000530
PDC

Appl
10

LOOP test is justified, particularly in light of the unnecessary challenge that would be imposed upon Unit 3's safety systems in conducting the LOOP test on Unit 3.

Additionally, we contend that, contrary to the TER input of your consultant in this matter as set forth in Enclosure 1 of Reference 4, Section D of RG 1.68 Rev. 2 explicitly authorizes the staff to accept alternative methods proposed by an applicant for compliance with specific portions of RG 1.68 Rev. 2. We believe that we have proposed an acceptable alternative, i.e., analysis of the results of the successful completion of integrated LOOP tests on Units 1 and 2.

Since this issue has been outstanding for more than a year, we suggest that a meeting may be in order, with appropriate NRC staff and consultants if necessary. We would be pleased to have an open discussion with the staff, concerning their viewpoint as well as ours. Please communicate with Carter Rogers as to your thoughts on this matter.

Very truly yours,



D. B. Karner
Executive Vice President

DBK/ACG/pvk

cc: G. W. Knighton
M. J. Davis
T. L. Chan
J. B. Martin
T. J. Polich
A. C. Gehr
E. E. Van Brunt, Jr.
J. G. Haynes

