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SUBJECT: Forwards change to QA program described in FSAR for approval prior to implementation.

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 TITLE: 50.54.a.3 & 50.55.f.3 Change to SAR QA Program

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Arizona Nuclear Power Project

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161-01581-DBK/LJM
December 23, 1988

Docket Nos. STN 50-528/529/530

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

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Change to Quality Assurance Program in Accordance
with 10CFR50.54(3), Conditions of Licenses
File: 88-005-419.05

In accordance with 10CFR50.54(a)(3), Arizona Public Service is submitting for approval, prior to implementation, a change to the Quality Assurance Program described in the PVNGS Final Safety Analysis Report (FSAR).

The identification of this change, the reason for the change, the basis for concluding that the change continues to satisfy 10CFR50, Appendix B, and the affected pages are attached to this letter.

In accordance with the requirements of 10CFR170.12(c), an application fee of \$150.00 is attached.

If there are any questions which pertain to this submittal, please contact A. C. Rogers at (602) 371-4041.

Very truly yours,



D. B. Karner
Executive Vice President

DBK/LJM/pvk
Attachment

cc: T. J. Polich (w/a)

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IDENTIFICATION OF CHANGE

The PVNGS FSAR, Section 17.2, Quality Assurance During the Operations Phase, contains by reference to Section 1.8, Conformance to NRC Regulatory Guides, a commitment to comply with NRC Regulatory Guide 1.137, Position C.2, Fuel Oil Systems for Standby Diesel Generators, Revision 1.

Dependent upon approval, APS will incorporate into Section 1.8 of the PVNGS FSAR an exception to Revision 1. This exception will substitute the two diesel fuel oil sampling tests required by the Guide with two equivalent tests. They are as follows:

Substitute test ASTM D2276, Particulate Containment in Aviation Turbine Fuels for test ASTM D2274, Oxidation Stability of Distillate Fuel Oil (Accelerated Method).

and

Substitute test ASTM D4057-81, Manual Sampling of Petroleum and Petroleum Products, for test ASTM D270-1975, Standard Method of Sampling Petroleum and Petroleum Products.

REASON FOR CHANGE

Testing in accordance with ASTM D-2274 has only limited value with regard to determining the acceptability of fuel oil for use in diesel engines because test results are only an indication of the tendency of fuel oil to degrade during storage, not the actual fuel oil condition. In addition, the accuracy of the test is questionable, and finally, the ASTM D-2274 test is more commonly used as a means of quality assurance at refineries. Testing in accordance with ASTM D-2276, however, will provide important information on the actual condition of the fuel in the storage tank. Comparison of test results over time will provide an accurate indication of actual fuel degradation, if any, in sufficient time for corrective action and without impairing EDG operation.

The basis for the substitution of ASTM D4057-81 for ASTM D270-1975 is that ASTM D270 has been deleted as an ASTM Standard.

BASIS FOR HOW THE CHANGE CONTINUES TO SATISFY

10CFR50 APPENDIX B

The quality of the diesel fuel oil will not be reduced by the use of these two tests in lieu of the two tests recommended by Regulatory Guide 1.137. Test ASTM D-2276 is better suited for satisfying the intent of Reg. Guide 1.137, than ASTM D-2274. Replacing test D270 which is no longer an ASTM standard with D4057-81 that performs a similar function and is an ASTM standard will maintain the controlled quality intended by Regulatory Guide 1.137.

CONFORMANCE TO NRC
REGULATORY GUIDESRESPONSE

~~Position C.2 of Regulatory Guide 1.137 is accepted.~~

See insert

REGULATORY GUIDE 1.140: Design, Testing and Maintenance
Criteria for Normal Ventilation
Exhaust System Air Filtration and
Adsorption Units of Light-Water-
Cooled Nuclear Power Plants
(Revision 0, March 1978)

RESPONSE

Information contained in Regulatory Guide 1.140 is utilized as discussed in sections 9.4 and 11.3, and in table 1.8-3.

REGULATORY GUIDE 1.141: Containment Isolation Provisions for
Fluid Systems (Revision 0, April 1978)

RESPONSE

The position of Regulatory Guide 1.141 is accepted (refer to subsection 6.2.4) except for the following. An exception is taken to Regulatory Guide 1.141 for the CVCS charging line containment isolation valve CHA-HV-524. This valve does not meet the guidance of Section 4.2.2 of ANSI N271-1976 which requires all power-operated isolation valves to be capable of remote manual actuation from the control room. The power supply for this valve is removed by locking open its breaker at MCC PHA-M3520. The restoration of the power supply requires local operator action at the MCC. This exception to lock open valve CHA-HV-524 ensures that a flow path is available for charging or auxiliary spray flow by preventing inadvertent operation of the valve.

~~FSAR Change Markup~~

~~FSAR Section 1.8 REGULATORY GUIDE 1.137, Position C.2 and its corresponding Response should be changed to read as follows:~~

~~REGULATORY GUIDE 1.137, Position C.2: Fuel Oil systems for Standby Diesel Generators (Revision 1, October 1979)~~

RESPONSE

Position C.2 of Regulatory Guide 1.137 is accepted with the following exceptions to the Guide and the referenced standard (ANSI N195-1976):

- A. ASTM D2276, Particulate Contaminant in Aviation Turbine Fuels, will replace ASTM D2274-70, Oxidation Stability of Distillate Fuel Oil (Accelerated Method), as outlined in Appendix B of ANSI N195-1976.
- B. Fuel oil sampling will be in accordance with ASTM D4057-81, Manual Sampling of Petroleum and Petroleum Products. This replaces ASTM D270-1975, Standard Method of Sampling Petroleum and Petroleum Products, which has been deleted as an ASTM standard.

