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SUBJECT: Responds to NRC Bulletin 88-011, "Pressurizer Surge Line
 Thermal Stratification."

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March 6, 1989

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
Response to NRC Bulletin No. 88-11, "Pressurizer
Surge Line Thermal Stratification"
File: 89-055-026

As requested by the subject NRC Bulletin, the purpose of this letter is to inform the staff of actions taken to resolve NRC concerns associated with the issue of Pressurizer Surge Line Thermal Stratification: The Combustion Engineering Owners Group (CEOG) became aware of this issue in April of 1987 when INPO issued a draft SER on surge line thermal cycling observed in a German nuclear plant. The CEOG proceeded to initiate a data collection program in June 1987 followed by actual data collection activities at two CEOG plants in June and August of 1988.

In October 1988, the CEOG authorized the ongoing CEOG program, "Reduction and Analysis of Pressurizer Surge Line Data Collected from CEOG Plants", to address surge line thermal stratification concerns. NRC Bulletin 88-11 was subsequently issued in December 1988. Action No. 1.b requested that within four months of receipt of the Bulletin, licensees of plants in operation over ten years demonstrate that the pressurizer surge line meets the applicable design codes and other FSAR and regulatory commitments for the licensed life of the plant. The staff suggested that this could be accomplished by performing a plant specific or generic bounding analysis. Licensees of plants in operation less than ten years were requested to complete the analysis within one year. These NRC Bulletin items prompted the CEOG to request a meeting with the NRC staff.

The NRC staff and the CEOG met on February 13, 1989 in the White Flint NRC offices. During this meeting, the CEOG presented the goals and scope of the ongoing CEOG surge line program which included a presentation of actual plant data and a discussion on the issue of thermal striping. The CEOG then requested relief from the four month/one year schedule requirement in Requested Action 1.b and suggested that the CEOG program be allowed to proceed on schedule.

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As a result of this meeting, the CEOG and NRC staff agreed on several action items to be completed as follows:

1. The CEOG will perform a preliminary bounding evaluation of CEOG surge lines using actual data collected from CEOG plants by July 1, 1989. This activity will address the intent of Requested Action 1.b for plants in operation over 10 years.
2. Actual plant data will be used to define loading conditions for input to the fatigue and stress evaluations.
3. The CEOG agreed to meet with NRC staff to discuss the load definitions prior to finalizing the bounding analysis described in item 1 above.

~~In conclusion, Palo Verde is a participant in the CEOG program and agrees to~~
support the above action items for responding to NRC Bulletin 88-11 Action 1.b.
On issuance of this letter, Reporting Requirement 2 in the Bulletin is
considered to be appropriately addressed.

Very truly yours,



D. B. Karner
Executive Vice President

DBK/JMQ/v1b

cc: A. C. Gehr (all w/a)
T. J. Polich
T. L. Chan
M. J. Davis
J. B. Martin

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Donald B. Karner, represent that I am Executive Vice President 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.

Donald B. Karner
Donald B. Karner

Sworn to before me this 6 day of March, 1989.

Dora E. Meador
Notary Public

My Commission Expires:

My Commission Expires April 6, 1991

