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SUBJECT: Forwards interim response to NRC Bulletin 88-010,
 "Nonconforming Molded Case Circuit Breakers."

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151-01808-DBK/JMQ

March 30, 1989

Docket Nos. 50-528/529/530

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

Reference: Letter from NRC to All Holders of Operating
Licenses or Construction Permits for Nuclear
Power Reactors dated November 22, 1988.
Subject: NRC Bulletin 88-10; Nonconforming
Molded-Case Circuit Breakers

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Response to NRC Bulletin 88-10; Nonconforming
Molded Case Circuit Breakers
File: 89-056-026; 89-070-026

Attached is the PVNGS interim response to NRC Bulletin 88-10. The final response to the bulletin's requested actions is scheduled to be submitted by December 31, 1989.

If you have any questions on this matter, please call Mr. A. C. Rogers of my staff at (602) 371-4041.

Very truly yours,

D. B. Karner
Executive Vice President

DBK/JMQ/vlb
Attachment

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

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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 30 day of March, 1989.

Y. ...
Notary Public

My Commission Expires:

My Commission Expires June 5, 1992

ATTACHMENT

INTERIM RESPONSE TO NRC BULLETIN 88-10

The safety related procurement, application, dedication and maintenance program at PVNGS offers a high degree of confidence in eliminating the use of counterfeit/unknowingly refurbished Molded-Case Circuit Breakers (MCCBs).

PVNGS safety related procurement program requires that all traceability documentation be part of the purchase order requirements. Safety related shipments without the proper required documentation will not be accepted by quality control receipt inspection and will be quarantined accordingly pending further evaluation. All safety related MCCBs have been purchased directly from the CBM unless they were dedicated.

The PVNGS commercial grade dedication program, starting October 31, 1984, allowed the dedication of commercially procured equipment/components for Safety Related (SR) service based on evaluating the critical characteristics of such equipment/components via an Equipment Change Evaluation (ECE) documenting the dedication requirements and characteristics, performing receipt inspection, handling and installing the items in accordance with quality related procedures, and testing, if appropriate. PVNGS' search for commercial grade dedication evaluation involving MCCBs revealed only four (4) evaluations from October 31, 1984 through August 1, 1988. The above commercial grade MCCB evaluations coupled with PVNGS testing program provides assurance that although the evaluated MCCBs may not be traceable to the circuit breaker manufacturer, they will perform their safety related function as required.

The subject bulletin's required actions include performing research activities covering August 1, 1983 through August 1, 1988 time frame. The PVNGS' procurement/dedication program as mentioned earlier, was in effect since October 31, 1984. The August 1, 1983 through October 31, 1984 period was covered by the Bechtel (A/E) program. As a result, Bechtel was contracted by APS to identify and evaluate any MCCB upgrades for the above period of time. The Bechtel investigation concluded that during the August 1, 1983 through October 31, 1984 time frame there was no program that allowed the upgrade of commercially obtained MCCBs for SR applications. In fact, based on the application procedures that were in effect at the time, stringent controls were administered to ensure that only safety related components were used in safety related applications. The Bechtel investigation also included the scanning of all the Non-Safety Related (NSR) purchase orders for their application determination. As a result, the majority of the NSR purchase orders were traced to their final application and no NSR purchase orders were found to be related to safety related applications. Based on the Bechtel findings, a reasonable assurance exists that NSR MCCBs procured commercially (possibly without verifiable traceability to the MCCB manufacturer) between August 1, 1983 and October 31, 1984 were not used in safety related applications. As a result of the above, APS has determined that no non-traceable or non-dedicated MCCBs were utilized in safety related applications.

Attachment
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APS will respond to the requested actions in NRC Bulletin 88-10 and any forthcoming NRC supplements thereto to add additional assurance to the validity of APS and Bechtel procurement, application and dedication programs. In order to completely respond to the bulletin's requested actions, an additional time period will be required. Therefore, the expected final response date to NRC Bulletin 88-10 is December 31, 1989.

