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SUBJECT: Confirms 900118 conversation re 18-month surveillance requirements for remainder of second fuel cycle.

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

161-02856-WFC/ACR/RAB
February 7, 1990

Docket No. STN 50-529

Document Control Desk
U. S. Nuclear Regulatory Commission
Mail Station P1-37
Washington, D.C. 20555

Reference: Letter from W. F. Conway (APS) to USNRC,
161-02489, dated October 13, 1989.
Subject: Proposed Technical Specification
Amendment

Dear Sir:

Subject: Surveillance Requirements for the Remainder
of the Second Fuel Cycle for Unit 2.
File: 90-056-026

This letter confirms a conversation between R. A. Bernier (APS) and T. L. Chan (NRC) held in Mr. Chan's office on January 18, 1990 concerning 18-month surveillance requirements for the remainder of the second fuel cycle for Unit 2.

Unit 2 is scheduled to operate continuously until February 23, 1990 when it will be shutdown for its second refueling. On that date, Unit 2 will have incurred 395 EFPD of fuel burnup. The Reload Analysis Report for fuel cycle 3 reload is based upon at least 394 EFPD of burnup. If an unforeseen event should necessitate or cause the unit to be shutdown, it may be necessary to postpone the start of the refueling outage.

During 1989, Unit 2 was shutdown for lengthy periods of time, thereby causing time to run out for the completion of numerous surveillance requirements, refer to the referenced letter. There are several other surveillance requirements for which the allowed frequency time would be in jeopardy if the refueling outage were to be delayed. Examples of such surveillance requirements are those for snubber inspection and several local leak rate tests.

APS believes that relief from surveillance requirements, beyond that which has already been granted, will be unnecessary. However, if unforeseen events force a shutdown of the Unit, it is likely that some relief will be necessary from upcoming surveillance requirements. APS will keep the staff informed of the possibility for needed relief and will submit any such requests in an expedient manner.

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February 7, 1990

If you have any questions, please call Mr. A. C. Rogers of my staff at (602) 340-4041.

Sincerely,



WFC/ACR/RAB/jle

cc: J. B. Martin
T. L. Chan
S. R. Peterson
D. H. Coe
A. C. Gehr
A. H. Gutterman