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SUBJECT: Provides response to NRC questions re steam generator eddy
 current exams at facility & request for extension of
 interval for exam.

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WILLIAM F. CONWAY
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161-03697-WFC/JRP

January 11, 1991

Docket No. STN 50-528

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

Reference: Letter from W. F. Conway, APS to NRC, dated November 14, 1990,
(161-03589).

Subject: Extension of Interval for SG Eddy Current Examination

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Extension of Interval for SG Eddy Current Examination
File: 91-F-005-419.05; 91-056-026

This letter is being provided in response to NRC questions regarding steam generator eddy current examinations at PVNGS and the request for an extension of the interval for this examination.

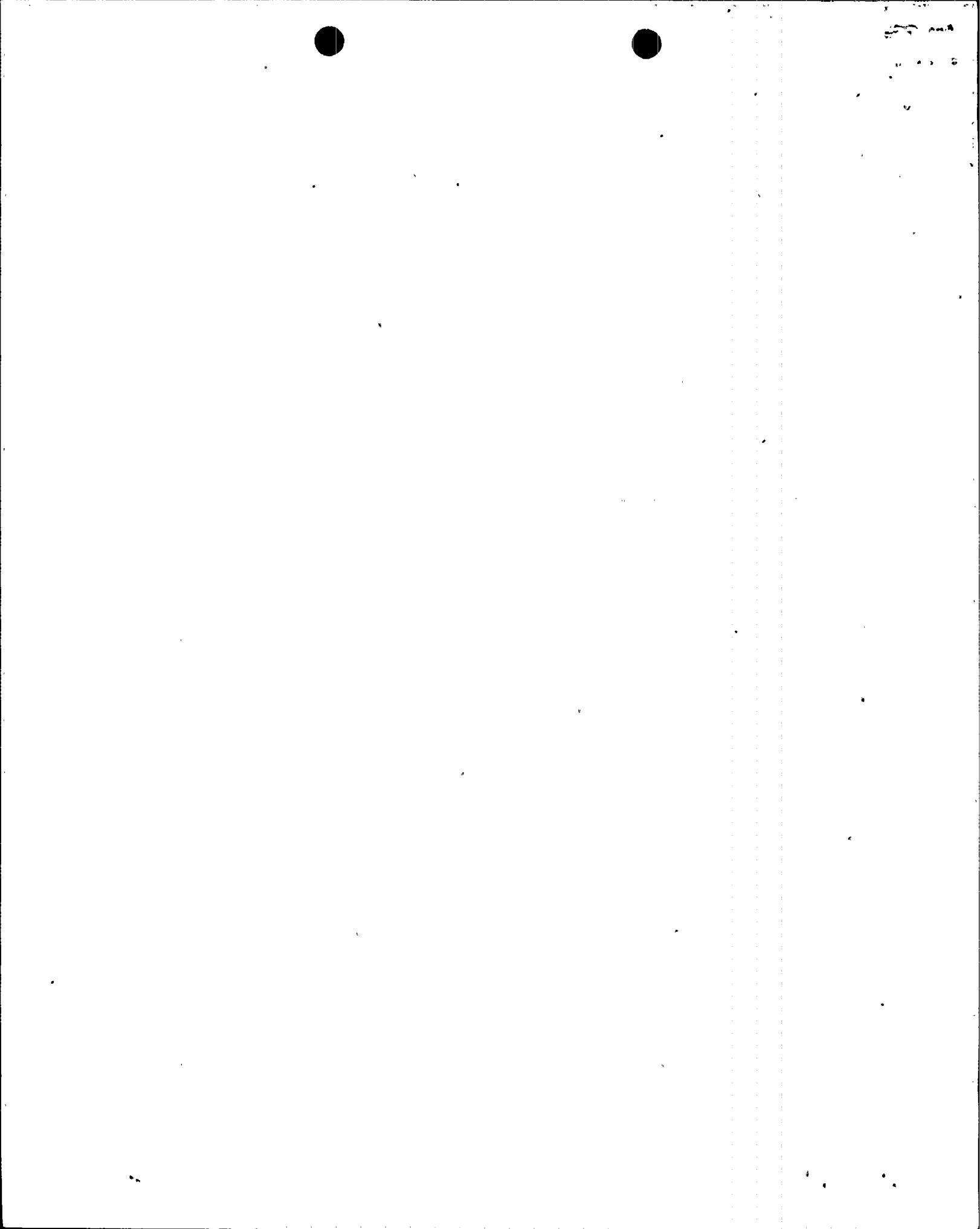
As a result of the NRC's recent review of the 1989 Unit 1 steam generator eddy current examination report, Mr. Trammell, of the NRC staff, requested that APS provide an explanation for not plugging two Unit 1 steam generator tubes, which had indications of greater than the Technical Specification limit for through wall wear at the time of the pre-service inspection. Additionally, he requested that APS describe the administrative controls currently in place to ensure that tubes which require plugging do, in fact, get plugged.

As stated in previous conversations and by the referenced letter, the Unit 1 steam generators 100% pre-service inspection (baseline) was performed during July and August of 1981. The analysis of the data identified approximately 10 tubes that were required to be plugged because of fabrication errors or damage. This data analysis was performed by the eddy current contractor and was not independently verified, nor was it required by procedure. During analysis of the July 1989, 100% eddy current examination data, it was discovered that two tubes in steam generator #1, R53 L116 and R39 L182, were degraded (i.e., 82% and 79% through wall indications). Upon re-review of the 1981 baseline eddy current tapes in 1989, both of these indications were present but had not been identified through the data analysis in 1981. It was also noted in 1989 that neither indication had grown larger since the baseline inspection. APS attributes not plugging the subject tubes to not having performed an independent verification of the eddy current data analysis in 1981.

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SG Eddy Current
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The procedures used for the 1989 eddy current examination did not require an independent verification of the data analysis; however, an independent verification of the data analysis was performed. The work orders generated to perform the tube plugging included Quality Control (QC) holdpoints to verify that the correct tubes were plugged. The Inservice Inspection (ISI) engineer performed an independent visual verification of the plugged tubes. Additionally, the contractor used for the 1989 steam generator tube plugging installation had a step in their procedure which identified APS work order requirements to include QC holdpoint identification for plug location.

A review of the work orders from the 1989 tube plugging indicated that all tubes identified in the eddy current test report have been plugged and that the plugs are in the correct locations.

The present requirements for steam generator eddy current examinations and tube plugging procedurally include an independent verification of the steam generator eddy current data analysis as well as QC holdpoints for verification that plugs are installed in the correct locations.

During the eddy current testing of the Unit 2 steam generators in April 1990, it was discovered that a tube, required to be plugged during the first Unit 2 refueling, had only been plugged on the cold leg side of the steam generator. The event was described in LER 2-90-005, which was transmitted by letter 192-00660 dated May 15, 1990. The discovery of this error during the 1990 inspection demonstrates that the process currently in place for steam generator eddy current testing is capable of determining degraded conditions and implementing corrective actions.

If you have any questions or require additional information, please contact M. E. Powell of my staff at (602) 340-4981.

Sincerely,



WFC/JRP/pmm

cc: C. M. Trammell
J. B. Martin
D. H. Coe
A. C. Gehr
A. H. Guttermann

