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SUBJECT: Requests temporary waiver of compliance from Limiting
 Condition for Operation 3.6.2.2.b re operability of iodine
 removal sys to permit plant operation while completing
 Surveillance Requirement 4.6.2.2.c.

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

161-04000-WFC/JRP
June 13, 1991

Docket No. STN 50-528

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

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Request for a Temporary Waiver of Compliance for Limiting Conditions
for Operation 3.6.2.2.b
File: 91-056-026

Arizona Public Service Company (APS) requests a temporary waiver of compliance with Limiting Condition for Operation 3.6.2.2.b. The temporary waiver is needed to allow continued operation of Unit 1 while completing surveillance requirement 4.6.2.2.c. The need for this waiver was discussed with Mr. C. M. Trammell on June 13, 1991.

REQUIREMENTS FOR WHICH THE WAIVER IS REQUESTED

The Limiting Condition for Operation 3.6.2.2.b requires that the Iodine Removal (IR) System shall be operable with two spray chemical addition pumps each capable of adding hydrazine solution from the spray chemical addition tank to a containment spray system pump flow. With the IR System inoperable, the ACTION Statement requires that the system be restored to operable status within 72 hours or be in at least HOT STANDBY within the next six hours; if the IR System is not restored to operable status within the next 48 hours be in COLD SHUTDOWN within the following 30 hours.

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CIRCUMSTANCES SURROUNDING THE SITUATION

Unit 1 is currently in MODE 1 and has been on line for 117 consecutive days. On June 11, 1991, at 0140 MST, plant personnel were performing surveillance requirement 4.6.2.2.c. During performance of this surveillance, the indicated flow rate for the "B" train spray chemical addition pump was unacceptable. The "A" train pump remains operable. Corrective measures taken include replacement of the drive belt and pump relief valve and calibration of the discharge pressure gage and flow transmitter. After these corrective measures were taken, the indicated flow rate remained unacceptable.

NEED FOR PROMPT ACTION

PVNGS Unit 1 will be required to commence shutdown at 0140 MST on June 14, 1991.

DESCRIPTION OF WHY THE SITUATION COULD NOT HAVE BEEN AVOIDED

Corrective measures taken to return the "B" train pump to operable condition have been unsuccessful. Returning the pump to operable condition within the 72 hours required by the ACTION Statement is unlikely.

COMPENSATORY MEASURES

An analysis has been completed which demonstrates that the IR System is not required. Therefore, no compensatory measures are necessary.

EVALUATION OF THE SAFETY SIGNIFICANCE AND POTENTIAL CONSEQUENCES OF THE PROPOSED REQUEST

An analysis, based on Standard Review Plan (SRP) 6.5.2, Revision 2, has been completed which demonstrates that the IR System is not required to mitigate the environmental or radiological consequences of a large break Loss of Coolant Accident (LBLOCA). This analysis includes:

- o Calculation of the iodine spray and plate-out removal coefficients and decontamination factors
- o Calculation of doses at crucial plant and offsite locations

- o Evaluation of the adequacy of the existing trisodium phosphate (TSP) system for long-term pH control.
- o Evaluation of the environmental impact of the deletion of the hydrazine spray additive on stress corrosion cracking, post-accident hydrogen generation, and equipment qualification inside containment

This analysis demonstrates:

- o Removal of the IR System has no significant impact on the radiological consequences of a LBLOCA
- o The current method for long-term containment sump pH control (TSP in baskets) remains acceptable
- o Removal of the IR System has no significant impact on the post-LOCA containment environment and its effects on post-LOCA hydrogen generation and equipment qualification

DURATION OF THE REQUEST

The temporary waiver of compliance is requested for a time period of up to seven days, beginning at 0140 MST on June 14, 1991.

NO SIGNIFICANT HAZARDS CONSIDERATION

The probability or consequences of an accident previously evaluated will not be increased by the proposed waiver of compliance. Unavailability of the IR System will not increase the probability of an accident previously evaluated because the IR System is not an event initiator, but operates only to mitigate the consequences of a LBLOCA. The consequences of an accident previously evaluated will not be significantly increased by the unavailability of the IR System because an analysis based on SRP 6.5.2, Revision 2 has been completed which demonstrates that the IR System is not required to mitigate the environmental or radiological consequences of a LOCA.

The proposed waiver of compliance will not create the possibility of a new or different kind of accident from any accident previously evaluated because no new accident scenarios can be postulated due to the unavailability of the IR System. The IR System is designed to operate only to mitigate the consequences of a LBLOCA. An analysis based on SRP 6.5.2, Revision 2, has been completed which demonstrates that the IR system is not required to mitigate the environmental or radiological consequences of a LOCA. The containment spray system will continue to perform its accident

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June 13, 1991

mitigation function without the IR system. Therefore, the possibility of a new or different kind of accident has not been created.

The proposed waiver of compliance will not result in a significant reduction in the margin of safety. The unavailability of the IR System will not significantly reduce any margin of safety because an analysis has been completed which demonstrates that the IR System is not required to mitigate the consequences of a LBLOCA.

ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed waiver of compliance does not involve an unreviewed environmental safety question because operation of PVNGS Unit 1 with "B" train spray chemical addition pump inoperable will not:

- 1) Result in a significant increase in any adverse environmental impact previously evaluated in the Final Environmental Statements (FES) as modified by the staff's testimony to the Atomic Safety and Licensing board; or
- 2) Result in a significant change in effluents or power levels; or
- 3) Result in matters not previously reviewed in the licensing basis for PVNGS which may have a significant environmental impact.

Pursuant to 10 CFR 50.91(b)(1), and by copy of this letter, Arizona Radiation Regulatory Agency is being notified of this request for a temporary waiver of compliance.

If you should have any questions, please contact Michael E. Powell of my staff at (602) 340-4981.

Sincerely,



WFC/JRP/pmm

cc: J. B. Martin
C. M. Trammell
D. H. Coe
A. C. Gehr
A. H. Gutterman
C. F. Tedford

