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SUBJECT: Provides licensee w/status of post-restart actions.Actions  
 proceeding ahead of schedule & actions rescheduled to later  
 date discussed in encl.

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WILLIAM F. CONWAY  
EXECUTIVE VICE PRESIDENT  
NUCLEAR

102-02076-WFC/TRB/DLK

October 22, 1991

Mr. J. B. Martin, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, CA 94596-5368

- Reference:
1. Letter dated June 24, 1990 from J. B. Martin, NRC, to W. F. Conway, APS.
  2. Letter No. 102-01294, dated June 8, 1989 from W. F. Conway, APS, to J. B. Martin, NRC.

Dear Mr. Martin:

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Post-Restart Actions  
File: 91-019-026

In Reference 1, the NRC advised APS of the NRC's intention to continue to monitor the progress of Post-Restart Actions identified in Reference 2. The purpose of this letter is to provide you with the status of those Post-Restart Actions. To date, twelve of the original one hundred forty actions remain open. Attachment 1 identifies two actions that are proceeding ahead of schedule and three actions that have been rescheduled to a later date. Attachment 2 identifies three actions that have been revised. Due to these revisions, Action No. 793 will be completed ahead of schedule, and Action No. 776 will be rescheduled to a later date, to be completed with Action No. 777. The remaining four actions (Nos. 50, 690, 796, and 799) are proceeding on schedule.

Should you have any questions or require additional information, please contact Mr. T. R. Bradish of my staff.

Very truly yours,



WFC/TRB/DLK/nk

Attachment 1 - Rescheduled Actions  
Attachment 2 - Revised Actions

cc: D. H. Coe  
C. M. Trammell

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## ATTACHMENT 1 - RESCHEDULED ACTIONS

### Record No.

### Description

513

"Evaluate and implement as required, a design change to provide low flow initiation capability for long path recirculation. Ensure approval of the Plant Change Package."

### Status

Site Modification (SMOD) 1, 2, 3-SM-SG-030 provides low flow initiation capability for long path recirculation. This SMOD, previously scheduled to be completed by January 12, 1993, is proceeding ahead of schedule. Installation is complete in Unit 3 and is expected to be complete in the other units prior to the end of their respective refueling outage - 2R3 (12/26/91) and 1R3 (04/11/92).

### Record No.

### Description

800

"Pending PMC approval and priority install a filter upstream of the accumulator."

### Status

Site Modification 1, 2, 3-SM-GA-002 adds a 3 micron filter upstream of the ADV nitrogen accumulator. This SMOD, previously scheduled to be completed by April 9, 1992, is proceeding ahead of schedule. Installation is complete in Units 1 and 3 and is expected to be completed in Unit 2 prior to the end of refueling outage 2R3 (12/26/91).

### Record No.

### Description

522

"Determine the cause for the SSO relay actuation and implement necessary corrective actions as identified by the SSO relay engineering action plan."

778

"Initiate and implement design change to provide for SSO relay quantities to be recorded on digital fault recorders."

Record No.

Description

779

"Initiate and implement design change to provide a voltage reference circuit which will allow only that target initiated by the relay operation to be displayed."

Status

The equipment necessary to record SSO relay quantities (i.e., frequencies) on the digital fault recorder and to allow the display of only the target (i.e., value at which the SSO relay will initiate) initiated by an SSO relay operation was installed in Units 1, 2, and 3 via temporary modifications. Design Change Package (DCP) 1, 2, 3 FE-MA-064, which changes the temporary modifications to permanent design was originally scheduled to be completed prior to the end of refueling outage 1R3 (4/11/92). The DCP was not completed in Unit 3 during refueling outage 3R2 and will not be completed in Unit 2 during the current refueling outage 2R3 because APS decided to implement higher priority modifications. This decision was based on the fact that although a temporary modification, the hardware is installed and operating as intended. DCP 1, 2, 3 FE-MA-064 has been rescheduled in the Long Range Plan and is expected to be completed in all three units prior to the end of refueling outage 1R4 (11/30/93).



## ATTACHMENT 2 - REVISED ACTIONS

### Record No.

776

"The Engineering Excellence Program system review working groups for the Q class electrical systems will factor the findings of the phase 2 report into the evaluation of the design basis review. Q electrical systems phase 3."

777

"The Engineering Excellence Program system review working groups for the Non-Q electrical systems will factor the findings of the phase 2 report into the evaluation of the design basis. Non-Q electrical systems phase 4."

### Status

The portion of the Engineering Excellence Program that addressed these two Post-Restart Actions transitioned into the Design Basis Reconfiguration Program. As a result of this transition and new definitions from NUMARC for systems and their interrelationships, the coordination of Q and Non-Q portions of the Design Basis Reconfiguration Program has changed. Q and Non-Q electrical system reviews are no longer being accomplished in separate phases (i.e., phase 3 for Q and phase 4 for Non-Q). For these reasons, Record Nos. 776 and 777 were combined and revised to read as follows:

"The Design Basis Reconfiguration Program system review working groups for the Q and Non-Q electrical systems will factor the findings of phase 2 of the Reliability Evaluation Report into the evaluation performed during the Design Basis Manual review."

This action is expected to be completed by 12/31/95.

### Record No.

### Description

793

"Where Non-Design basis discrepancies were found, they will be resolved as a major project. This project will perform a comprehensive review of all lighting (emergency, essential and normal)."

### Status

The Unitized Lighting Drawing Project addressed Post-Restart record No. 793 in two phases. Phase I involved the critical operating areas of the plant such as the Control,





Auxiliary, and Diesel Generator Buildings and the Main Steam Support Structure. Phase II involved the non-critical operating areas which contain primarily, non-safety related equipment or which require minimal or no operator activity for safe shutdown such as the Turbine, Fuel, Radwaste, and Containment Buildings. Phase I was completed as originally planned. One hundred seventy unitized drawings were developed and issued for the critical operating areas, including emergency and safe-shutdown drawings. Unitized lighting drawings for non-critical operating areas will not be developed at the present time. Instead, methods (procedures, work plans, or other means of control) will be developed and implemented in order to mitigate potential personnel safety hazards. For these reasons, Record No. 793 is being revised to read as follows:

"A comprehensive review of critical operating area lighting (emergency, essential and normal) will be conducted through the Unitized Lighting Drawing Project which is governed by instructions contained in Engineering Study 13-ES-A14. Problems identified as a result of this review will be documented through one of the PVNGS problem reporting systems. Personnel safety concerns will be controlled administratively in the non-critical operating areas through the use of methods that govern work."

The above methods and their implementation requirements will be completed by 12/31/91.

