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SUBJECT: Provides addl info requested by NRC during telcon on 930303,
 in support of relief request from ASME code re hydrostatic
 pressure test requirements involving steam generators.

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-02446-WFC/JRP

March 11, 1993

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Washington, D. C. 20555

Reference: Letter 102-02368, dated December 10, 1992, from W. F. Conway, Executive Vice President, Nuclear, APS, to the USNRC "Relief Request from ASME, Section XI Hydrostatic Pressure Test Requirements"

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Response to Request for Additional Information
Concerning Relief Request from ASME, Section XI
Hydrostatic Pressure Test Requirements
File: 93-056-026**

The purpose of this letter is to provide the additional information requested by the NRC during a telephone conference call with Arizona Public Service Company (APS) on March 3, 1993. The additional information is in support of the referenced relief request for relief from American Society of Mechanical Engineers (ASME), Section XI, hydrostatic pressure test requirements involving Steam Generators (SG). The relief would allow the hydrostatic pressure test to consist of an In-Service Leak Test (ISLT) at normal secondary operating pressure in Mode 3, as opposed to the 1.25 times design pressure test currently required for Class 2 components. The relief is necessary to allow the installation of two, seven-inch diameter SG secondary side handholes. The handholes will provide access to the secondary tube bundle and tubesheet for the removal of loose parts, the performance of tubesheet inspections, and sludge lancing. The preliminary work for the handhole installation is scheduled to begin on March 24, 1993. Therefore, APS requests NRC approval of the relief request by March 22, 1993.

Additional Information

1. Prior to beginning the handhole modification, the area of the weld build-up pad for the handhole and a 20 inch radius from the center of the pad area will be ultrasonically examined to the following acceptance criteria.

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- A. Any area, where one or more discontinuities produce a continuous total loss of back reflection accompanied by continuous indications on the same plane that can not be encompassed within a circle whose diameter is 3 inches or $1/2$ of the plate thickness, whichever is greater, is unacceptable.
 - B. In addition, two or more defects smaller than described in A above shall be unacceptable unless separated by a minimum distance equal to the greatest diameter of the larger defect or unless they may be collectively encompassed by the circle described in A.
2. If the inspection of Item 1, results in relevant indications that are outside of the acceptance criteria of Item 1, APS will advise the NRC.
3. During the next two refueling outages, subsequent to installation of the SG handhole, each handhole will be liquid penetrant examined if the handhole cover is removed. It is expected that the handhole cover will be removed for Foreign Object Search and Retrieval (FOSAR) and sludge lancing activities during these outages. However, due to potential corrosion issues associated with dry layup conditions, the handhole covers should not be removed for the examination only, but rather concurrently with planned SG secondary side activities. During the conference call with the NRC Staff, APS committed to visually inspect the handhole bore. Due to the lack of specific flaw acceptance standards in ASME B&PV Code, Section XI, for visual examination of pressure boundary material, APS proposes a liquid penetrant examination be performed. Acceptance standards will be in accordance with the PVNGS Section XI inspection program.
4. During the design phase of the SG handhole installation project, a complete demonstration of the modification was performed on a spare economizer SG in the vendor's facility in Chattanooga, TN. The purpose of the demonstration was to test and refine the installation technique prior to performing the modification in the plant. The demonstration included the non-destructive examination testing, the weld pad build up, machining of the stud holes, machining of the handhole bore and Electrode-Discharge Machine of the handhole bore.

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Should you have any questions, please call Thomas R. Bradish at (602) 393-5421.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. J. Murray".

WFC/JRP/rv

cc: J. B. Martin
J. A. Sloan
C. M. Trammell

