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 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530

AUTH. NAME AUTHOR AFFILIATION
 SAPORITO, T.J. Affiliation Not Assigned
 RECIP. NAME RECIPIENT AFFILIATION
 Ofc of the Executive Director for Operations

SUBJECT: Requests that NRC institute show cause proceeding, per
 10CFR2.202 to modify, suspend or revoke licensee OLS NPF-41,
 NPF-51 & NPF-74 relevant to PVNGS, per 10CFR2.206.

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January 4, 1993

Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: ARIZONA PUBLIC SERVICE COMPANY, PALO VERDE NUCLEAR STATION
License Nos. NPF-41, 51 & 74
Docket Nos. 50-528, 529 & 530

Dear Sir:

Pursuant to 10 C.F.R. § 2.206, Thomas J. Saporito, Jr., ("Petitioner"), requests specific actions by the U.S. Nuclear Regulatory Commission (NRC) within a reasonable time directed towards the Commission licensee the Arizona Public Service Company (Licensee) operator of the Palo Verde Nuclear Generating Station located near Phoenix, Arizona.

Specific Request:

- A. Petitioner requests that the NRC institute a show cause proceeding pursuant to 10 C.F.R. § 2.202 to modify, suspend, or revoke the Licensee's operational licenses NPF-41, 51 & 74 relevant to the Palo Verde Nuclear Generating Station.
- B. Petitioner requests that the NRC take appropriate actions to cause the immediate shut down of the (3) three reactor cores at the Palo Verde Nuclear Generating Station.
- C. Petitioner requests that the NRC take appropriate enforcement action against the Licensee.
- D. Petitioner requests that the NRC deny the Licensee's November 13, 1990 request to the NRC for an Amendment to the Palo Verde Nuclear Generating Station Units 1, 2, and 3 Technical Specifications Sections 3/4.3.1, 3/4.4.2, 3/4.7.1, and 3/4.7.1.2.

Basis and Justification:

1. The licensee has not established a need for the Technical Specification changes; that he has not shown that the proposed changes, if adopted, could be met; that the analytic model for the pressurizer safety valve is flawed; and that the main steam safety valve tolerance as proposed will produce an average setpoint which is not +3 percent but +6.4 percent above the design pressure of the main steam system. See Exhibit 1: NRC December 4, 1991 memorandum for Robert C. Jones, Chief Reactor Systems Branch from Jack E. Rosenthal, Chief Reactor Operations Analysis Branch.
2. Three out of four of the Unit 3 Pressurizer Safety Valves tested off-site were found to have setpoints outside the allowable range. The setpoint drift was documented in the licensee's Root Cause of Failure (RCF) EER 91-RC-052 and PRS 1917. See Exhibit 2:

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PDR ADOCK 05000528
P PDR

EDO --- 008465
92-67580-A-02

ADD 1

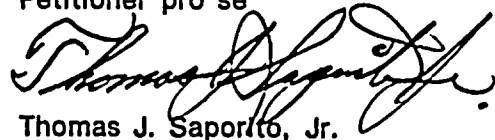
Licensee Correspondence I.D.#320-00102-MSD dated June 5, 1991 from M.S. Coppock to B.S. Ecklund.

3. The request to amend the setpoint tolerances for the Main Steam Safety Valves and the Pressurizer Safety Valves would allow only a 9.1 psia margin between the safety limit of 2750 psia and the peak pressure of 2740.9 psia. See Exhibit 3: Licensee Correspondence I.D.#054-01205-GSG dated March 6, 1991 from George Green to William Rudolph. See also Exhibit 4: The Station Design Basis at Section 3/4.4.2 Safety Valves.
4. The licensee's Unit 1 sustained an out of tolerance condition on (14) fourteen of the (20) twenty Main Steam Safety Valves and an out of tolerance condition on (2) two of the (4) four Pressurizer Safety Valves in the first quarter of 1992. During disassembly of the Pressurizer Safety Valves, various valves were found with their blowdown rings out of their required position. The actual experience with safety valves in nuclear applications is that frequently they neither lift at the required setpoint nor reseal tightly without leaking. The variation of the setpoint from the requirements often exceed not only the ± 1 percent tolerance but also the ± 3 percent tolerance. See Exhibit 5: Licensee's Condition Report/Disposition Request (CRDR No. 1-2-0139)
5. The manufacturer of the licensee's safety valves (Dresser) warrants their safety valves for operation at only ± 3 percent of setpoint and not the ± 1 percent of setpoint required by the licensee's Technical Specifications. The safety valve - regardless of its manufacturer or its application - experiences setpoint drift which is not within the tolerance of ± 1 percent required Technical Specifications or the ± 3 percent warranted by the valve vendors. See Exhibit 6: (In Part) NRC Special Study Safety and Safety/Relief Valve Reliability dated April, 1992 and Prepared by Mary S. Wegner, Reactor Operations Analysis Branch Office for Analysis and Evaluation of Operational Data.

WHEREFORE, the above stated reasons, the licensee cannot demonstrate to the NRC reasonable assurance for the continued safe operation of the Palo Verde Nuclear Generating Station. Accordingly, it is appropriate for the NRC to consider this Petition pursuant to 10 C.F.R. § 2.206 wherein the petitioner has set forth the facts that constitute the basis for the request. See Philadelphia Electric Company (Limerick Generating Station, Units 1 and 2), DD 85-11, 22 NRC 149, 154 (1985).

For the Environment,

Petitioner pro se



Thomas J. Saporito, Jr.

cc: The Honorable John Dingell
Harold Fossett, NRC I.G.
John Martin, Adm. NRC RV
Philip Joukoff, O.I. NRC RV
Oscar DeMiranda, SAC NRC RII
Mary S. Wegner, NRC AEOD
David K. Colapinto, Esq.

EXHIBIT NO. 1