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SUBJECT: Forwards revised pages to ISI summary manual for PVNGS Units 1,2 & 3,incorporating comments received 950731 & 0830.

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MA

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WILLIAM L. STEWART
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-03571-WLS/SAB/TNW
December 20, 1995

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Washington, DC 20555

Reference: Letter No. 102-02447, dated March 12, 1993, Inservice Inspection Program Summary Manual, from the Arizona Public Service Company to the USNRC

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Inservice Inspection Program (ISI)

Enclosed please find revised pages of the ISI Program Summary Manual for PVNGS Units 1, 2, and 3. The pages of the ISI Program Summary Manual have been revised to incorporate comments received July 31, 1995, and August 30, 1995, via fax from NRR Project Manager, Mr. Charles Thomas. The comments were provided as a result of the NRC review of Revision 1 of the ISI Program Summary Manual. Revision 1 was submitted in the referenced letter and contained three new relief requests, identified as Relief Request Numbers 6, 7, and 8.

Enclosure 1 contains the comments received from Mr. Thomas, followed by Arizona Public Service Company's (APS) response to the comments. Enclosure 2 contains the revised pages of the ISI Program Summary Manual incorporating APS' response to the comments.

Should you have any questions, please contact Scott A. Bauer at (602) 393-5978.

Sincerely,

Gregg R. Overbeck for WLS

WLS/SAB/TNW/rv
Enclosures

cc: L. J. Callan
K. E. Perkins
C. R. Thomas
K. E. Johnston

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ENCLOSURE 1

COMMENTS AND RESPONSES

TO ISI PROGRAM SUMMARY MANUAL

Comment No. 1:

The licensee submitted three new requests for relief in Revision 1 to the ISI Program. Based on a review of these requests, it has been determined that in two cases, the licensee has not provided sufficient information to perform an evaluation. In order to evaluate Requests for Relief 7 and 8, the licensee should describe the applicability of the Code requirement, and how the proposed alternative provides equivalency or provides an acceptable level of quality and safety.

Relief Request 7

The licensee has presented this request for relief generically for penetration piping. The licensee should identify specific lines affected. The licensee should describe the impracticality or burden associated with meeting Code requirements. The licensee should describe the alternative test that is being proposed and describe how it provides either equivalency to the code required test or provides an acceptable level of quality and safety.

Relief Request 8

The licensee has presented this request for relief generically for Inservice Pressure Tests. The licensee should identify specific lines affected. The licensee should describe the impracticality or burden associated with meeting Code requirements. The licensee should describe the alternative test that is being proposed and describe how it provides either equivalency to the code required test or provides an acceptable level of quality and safety.

Response No. 1:

Relief Request Number 7 requests approval to use 10 CFR 50 Appendix J tests in lieu of hydrostatic pressure tests for designated piping and isolation valves. The relief request is based upon the ability to verify containment integrity through the application of Appendix J criteria. This relief has been approved by the ASME Boiler and Pressure Vessel Code committee and the Board of Nuclear Codes and Standards as ASME Code Case N-522. This Code Case has not, however, been approved and included in the periodic revision to Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability - ASME Section XI Division 1" and therefore needs specific NRC approval. The relief request has been revised to specify which lines are applicable to this relief request. The requirement to perform a hydrostatic test on these lines in addition to the 10 CFR 50 Appendix J test, imposes a burden of duplicate testing. Duplicate testing results in an increase in the total amount of work needed to be performed during plant outages, and increases the radiological exposure without a compensating increase in the level of quality or safety.

Relief Request Number 8 has been withdrawn.

No comments were provided, nor were any changes made, to Relief Request Number 6.

Comment No. 2:

In Section 3.5 of the ISI Program, the licensee stated that the interval start dates for Units 1, 2, and 3 have been modified to establish a common interval start date. In the Safety Evaluation submitted to the licensee on October 21, 1987, it was determined that the average operating license start date was before October 28, 1986. In the table of start dates provided, the schedules are given as:

Unit 1	01-28-86 to 07-17-98
Unit 2	09-19-86 to 03-17-97
Unit 3	01-08-88 to 01-10-98

The start dates noted above are not common for the three units. Describe the scheduling philosophy currently being implemented and the discrepancy in the common start dates.

The licensee provided tables only, of dates to show a common average start date for the three units. The licensee shows the common commercial operation start date of 3-18-87. This is not consistent with the NRC Safety Evaluation that states that the average Operating License issuance date for PVNGS is before October 28, 1986. It is still unclear how the licensee established the current common start date. Explain the methodology used by APS to support the current common start data given in the table.

Response No. 2:

There are two different sets of dates that are averaged for the ISI Program. The first date is the 5% operating license date for each of the three units. Paragraph 10 CFR 50.55a(g)(4)(i) requires that inservice inspection of components during the initial 120-month inspection interval comply with the requirements of the latest edition and addenda of the ASME Section XI Code referenced in 10 CFR 50.55a(b) on the date 12 months prior to the date of the issuance of the operating license. In order for the PVNGS site to use a single ASME Code for all three units, the average 5% operating license date was used to determine which ASME Code Edition would be used for the first inspection interval. The NRC Safety Evaluation stated that October 28, 1985, was when the ASME Section XI 1983 Edition including Addenda through the Summer of 1983 (83E83S) was incorporated into 10 CFR 50.55a. Operating licenses issued

subsequent to October 28, 1986 (one year after the ASME code was incorporated into the 10 CFR 50.55a), would be required to use 83E83S Code. The average 5% operating date for the PVNGS site is in September of 1985. Therefore, since the average 5% operating license date for the PVNGS site is before October 28, 1986, the use of the ASME Section XI 1980 Edition including Addenda through the Winter of 1981 (80E81W) was approved by the NRC with the condition that PVNGS establish a common start date based on the average date of commercial service in accordance with ASME Section XI subparagraph IWA-2400(b).

The second date that was averaged for PVNGS was the date of commercial operation. The average date of commercial operation for the PVNGS site is March 18, 1987. The actual start date for the first 120-month inspection interval for each Unit was not March 18, 1987, since ASME inspections commenced at the unit specific commercial operation date. Therefore, the table in the ISI program refers to the start of the ISI inspection period, rather than the average site date for commercial operation. The average PVNGS site common start date is identified in the ISI Program as March 18, 1987, and is used in accordance with the Safety Evaluation Report received from the NRC. The end date for the first 120-month inspection interval is not March 17, 1997, in all cases because the Units 1 and 3 end dates were extended due to lengthy outages.

Comment No. 3:

In Relief Request 3, it appears that the licensee has changed the proposed alternative reviewed and approved by the NRC, in the NRC letter dated October 21, 1987 (as referenced in the program relief request). The alternative examination given in the Safety Evaluation states:

"The mechanical and welded attachments will be visually examined to the extent practical. The insulation will be removed from around the support attachment for further examinations whenever the mechanical connections cannot be examined or whenever an abnormality is detected."

The proposed alternative in the ISI program Relief Request 3, states: "The mechanical and welded attachments will be visually examined to the extent practical. The insulation will be removed from around the support attachment for further examinations whenever an abnormality is detected."

Explain the deletion of "the mechanical connections cannot be examined or whenever" from the request for relief.

Note: IWF-1300 (e) states: "where the mechanical connection of a nonintegral support is buried within the component insulation, the support boundary may extend from the surface of the component insulation, provided the support either carries the weight of the component or serves as a structural restraint in compression."

The licensee noted that for Relief Request 3, a typographical error occurred from revision 0 to revision 1. The words left out of Revision 1 are significant. Therefore, the licensee should provide a revision to Relief Request 3 to insure that this relief request is not misinterpreted.

Response No. 3:

Relief Request has been revised to include the phrase "the mechanical connections cannot be examined or whenever". It was omitted in error.

ENCLOSURE 2

REVISED PAGES OF THE

ISI PROGRAM SUMMARY MANUAL