

# CATEGORY 1

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SUBJECT: Requests authorization to implement alternative to requirements of 10CFR50.55a(f) re Pump & Valve IST Program.

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Arizona Public Service

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102-03730-WLS/SAB/RJR  
July 11, 1996

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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Dear Sirs:

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

In accordance with 10 CFR 50.55a(a)(3)(ii), Arizona Public Service Company (APS) requests authorization to implement an alternative to the requirements of 10 CFR 50.55a(f). The proposed alternative involves a 12-month extension of the date for the 120-month IST program update required by 10 CFR 50.55a(f)(4)(ii). The current requirement, proposed alternative, and basis for requesting the alternative are provided in Enclosure 1.

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

Sincerely,



WLS/SAB/RJR/pv

Enclosure

cc: K. E. Perkins  
L. J. Callan  
J. W. Clifford  
K. E. Johnston



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PDR ADDOCK 05000528  
PDR



**ENCLOSURE**

**12-MONTH EXTENSION OF THE  
120-MONTH IST PROGRAM UPDATE**



## 12-Month Extension of the 120-Month IST Program Update

### Current Requirement:

10 CFR 50.55a(f)(4)(i) requires that licensees conduct inservice tests during the initial 120-month interval to verify operational readiness of pump and valves whose function is required for safety. After the initial 120-month interval, 10 CFR 50.55a(f)(4)(ii) requires that licensees conduct inservice tests during successive 120-month intervals to verify operational readiness of pumps and valves whose function is required for safety. In conducting these tests, licensees must comply with the requirements of the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b) 12 months before the start of the 120-month interval, subject to the limitations and modifications listed in paragraph (b).

In 1995, PVNGS changed the 120-month intervals for the Unit 1, 2, and 3 IST programs in order to establish concurrent intervals. The change revised the end dates of the initial 120-month intervals and the start dates of the second 120-month intervals of all three units to a common date of January 15, 1997. The original schedules were based on the commercial operation dates of the units. This change was made to provide greater consistency between units and to simplify the 120-month updates required by 10 CFR 50.55a(f)(4)(ii). The change was done under the provisions of paragraph IWA-2400(c) of Section XI of the ASME Boiler and Pressure Vessel Code (1980 Edition, Winter 1981 Addenda), which allows inspection intervals to be decreased or extended by as much as one year without prior NRC approval. These interval changes are summarized in the table below.

Unit	Original Schedule		Current Schedule	
	First Interval	Second Interval	First Interval	Second Interval
1	1-28-86 to 1-28-96	1-28-96 to 1-28-06	1-28-86 to 1-15-97	1-15-97 to 1-15-07
2	9-22-86 to 9-22-96	9-22-96 to 9-22-06	9-22-96 to 1-15-97	1-15-97 to 1-15-07
3	1-08-88 to 1-08-98	1-08-98 to 1-08-08	1-08-88 to 1-15-97	1-15-97 to 1-15-07

### Proposed Alternative

PVNGS proposes to extend the end date of the first 120-month IST interval and the start date of the second 120-month interval 12 additional months from January 15, 1997, to January 15, 1998, as shown in the table below.

Unit	Current Schedule		Proposed Schedule	
	First Interval	Second Interval	First Interval	Second Interval
1	1-28-86 to 1-15-97	1-15-97 to 1-15-07	1-28-86 to 1-15-98	1-15-98 to 1-15-08
2	9-22-96 to 1-15-97	1-15-97 to 1-15-07	9-22-96 to 1-15-98	1-15-98 to 1-15-08
3	1-08-88 to 1-15-97	1-15-97 to 1-15-07	1-08-88 to 1-15-98	1-15-98 to 1-15-08



Basis for Requesting Alternative:

This request is being submitted under 10 CFR 50.55a(a)(3)(ii).

As one of the lead pilot plants for the EPRI risk-based IST pilot project, PVNGS has been working closely with the NRC, industry groups, and other utilities to develop an acceptable risk-based IST program. This program will provide a methodology for determining the safety significance of components in the IST Program and testing those components commensurate with their safety significance. The emphasis PVNGS has placed on this effort utilizes IST expertise and resources that otherwise would be dedicated to the 120-month IST program update required by 10 CFR 50.55a(f)(4)(ii). Performing the 120-month update after the risk-based IST pilot program development is completed (approximately December 1996) would not allow sufficient time to perform the update before January 15, 1997, when the current first interval expires.

The 120-month IST program update involves revising the program and its implementing procedures to comply with the code edition endorsed by 10 CFR 50.55a(b). Currently this is the 1989 edition. Although the 1989 edition offers minor improvements over the 1980 Edition/Winter 1981 Addenda currently in use at PVNGS, its use provides very little increase in the level of quality and safety. Therefore, postponing or abandoning the risk-based IST pilot project in order to perform the 120-month update on the current schedule imposes an unusual difficulty without a compensating increase in the level of quality and safety.

For this reason PVNGS proposes extending the end date of the first interval and the start date of the second interval, 12 months from January 15, 1997, to January 15, 1998, for each unit. Doing so will provide adequate time to complete development of the risk-based IST pilot program before IST resources are refocused on the 120-month update.



Self def. for  
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495-5829  
F-11, CH Acoustic