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ACCESSION NBR:9803110343 DOC.DATE: 98/03/02 NOTARIZED: NO DOCKET #
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STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530
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SUBJECT: Informs NRC of change in status of corrective actions associated w/subject violation as previously documented, APS is requesting change in commitment date for Unit 1 only.

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102-04085 – JML/AKK/RJH
March 2, 1998

U. S. Nuclear Regulatory Commission
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References: 1. Letter 102-03728-WLS/AKK/RJH dated July 03, 1996 from W. L. Stewart to the U.S. NRC Document Control Desk

2. Letter 102-03907-JML/AKK/RJH dated April 03, 1997 from J. M. Levine to the U.S. NRC Document Control Desk

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Status of Commitments for Notice of Violation 50-529/96-06-01

The purpose of the letter is to inform you of a change in the status of corrective actions associated with the subject violation as previously documented in our April 3, 1997 response letter, reference 2. We are requesting a change in the commitment date for Unit 1 only. The requested change is from the April 1998 (1R7) outage due date to the fall outage 2002 (1R10). This change is necessary to facilitate improvements to the repair methods for the upper guide structure bushing in Unit 1. The following is a brief history of this issue and the bases for the change in commitment dates.

Background

On March 24, 1996, Palo Verde refueling crews experienced problems extracting fuel assembly A07 from the Unit 2 reactor core. As a result, a special NRC inspection was conducted and the results documented in NRC Inspection Report 50-529/96-06 including Notice of Violation 96-06-01. In response to the concern identified in the subject violation, Arizona Public Service Company (APS), as described in Reference 1 above, initially committed to implement a design modification to install a more positive alignment system for the upper guide structure during each Unit's respective refueling outage with final installation to be completed during the Unit 2 refueling in November 1997.

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During the refueling outage for Unit 1 in November 1996, refueling crews discovered that the upper guide structure lift rig bushing was damaged. The resulting corrective actions removed the damaged bushing. With the bushing removed, the alignment pin modification was deferred due to the fact that the bushing itself was an essential reference point used to establish critical dimensions for the spatial orientation of the alignment pin. Subsequently, APS issued a letter as described in Reference 2 above, to inform the NRC of a revision to the initial commitment dates for the modification completion. Instead of the final installation expected for Unit 2 in November 1997, we requested the final installation to be scheduled for the Unit 1 refueling outage (1R7) in the spring of 1998.

The alignment pin modifications were successfully installed in Unit 3 in March 1997 and in Unit 2 in September 1997. Based on further Palo Verde Engineering evaluation, operating experience from the Palo Verde refueling team, and vendor recommendations, the initial bushing modification installed in Unit's 2 and 3 has been recently revised to include enhancements to improve the overall design clearances for the upper guide structure bushing and alignment pins.

Basis for Change

The first phase of the bushing repair for Unit 1 is currently scheduled to begin in the Unit 1 spring outage as previously committed but will differ from the design of Unit's 2 and 3. The alignment pin modification will also begin in Unit 1 for the spring outage. However, due to the new bushing design, the completion of the modification for the bushing and associated alignment pin will continue through the Unit 1 refueling outage 1R10 (2002).

Due to the extended time frame for completing this modification, Palo Verde refueling teams will continue to implement the compensatory measures previously described in our initial response to the notice of violation, reference 1. These compensatory actions include the use of underwater cameras for verification of coordinates prior to and during movement of the upper guide structure. Palo Verde management believes that these compensatory measures, in conjunction with increased awareness by the refueling team are sufficient to mitigate potential damage to the upper guide structure and associated fuel assemblies.

The proposed change in the commitment due date to complete this modification does not involve changes to station Technical Specifications, the Facility Operating License, or codified design requirements. The proposed modification does not impact the operation of any system or component in normal or accident operating conditions and does not increase the probability of an accident previously evaluated.

The proposed corrective actions for Notice of Violation 96-06-01 were reviewed by Region IV NRC on April 4, 1997, and found to be satisfactory and were subsequently closed as documented in NRC inspection Report 97-011.

Based on the above, we are requesting that the commitment date be changed to complete the alignment system final installation in Unit 1 by 1R10, year 2002.

Should you have any questions regarding this request, please contact Ms. Angela K. Krainik at (602) 393-5421.

Sincerely,

JML/AKK/RJH/mah

cc: E. W. Merschoff
J. W. Clifford
K. E. Perkins
D. A. Powers
J. H. Moorman