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LEVINE,J.M. Arizona Public Service Co. (formerly Arizona Nuclear Power
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SUBJECT: Discusses results of SG operation assessment for Unit 2 cycle operation.Results concluded that unit may safely operate for full duration current fuel cycle.

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Palo Verde Nuclear
Generating Station

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102-04120–JML/SAB/RMW
May 7, 1998

U. S. Nuclear Regulatory Commission
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References: 1. Letter 102-04040-JML/AKK/JRP, dated November 18, 1997, from J. M. Levine, Senior Vice President, Nuclear, APS to USNRC.

2. Letter 102-03931-JML/AKK/JRP, dated May 09, 1997, from J. M. Levine, Senior Vice President, Nuclear, APS to USNRC.

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 2
Docket No. STN 50-529
Steam Generator Operational Assessment for Unit 2 Cycle 8 Operation

Reference 1 submitted to the NRC an interim steam generator operational assessment that was performed for Unit 2 Cycle 8 operation. As indicated in Reference 1, the installation of shroud holes was completed in Unit 2 steam generator 22 during the sixth refueling outage for Unit 2 (U2R6). No shroud holes were installed in steam generator 21. Steam generator eddy current testing that was performed during the Unit 2 seventh refueling outage (U2R7) identified accelerated tube wear in the batwing stay cylinder (BWSC) region of steam generator 22 due to the installation of the shroud holes. The Unit 2 interim operational assessment that was performed due to this condition conservatively adopted the assumption that the worst Unit 2 tube wear indication observed in the BWSC region had developed from 0% to 93% during a 16.5 month operating cycle. The Unit 2 interim analysis also conservatively assumed that any tube in the BWSC region of steam generator 22 was susceptible to an accelerated growth rate, despite the fact that all of the critical tubes that may have been affected were either preventatively plugged or plugged for cause. Based on these assumptions, APS concluded that interim Unit 2 operation was justified for at least 10.6 months. This time period would allow acceptable operation of Unit 2 until September 1, 1998.

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In Reference 1, APS committed to perform a final steam generator operational assessment for Unit 2 Cycle 8 operation by February 15, 1998. Although the initial results of this assessment concluded that full cycle operation for Unit 2 is warranted, APS elected to perform additional engineering evaluations of this wear phenomena to provide additional assurance that the integrity of the Unit 2 steam generators tubing is maintained during the current cycle of operation. This assessment incorporated a determination of the applicability of the U2R7 steam generator eddy current testing results to Unit 2 Cycle 8 operation. Based on the determination that the wear phenomenon continues to behave as indicated in the operational assessment report for Unit 2 Cycle 7 that was submitted by APS in Reference 2, APS concludes that Unit 2 may safely operate for the full duration of the current fuel cycle. The final assessment results for Unit 2 indicate a probability of less than 10^{-3} that wear rates in the BWSC region will result in an indication which fails to satisfy the structural ($3\Delta P$) and leakage integrity limits defined in Draft Regulatory Guide 1074, Steam Generator Tube Integrity.

COMMITMENTS MADE AS PART OF THIS DOCUMENT

This letter does not make any commitments to the NRC.

Please contact Mr. Scott Bauer at (602) 393-5978 if you have any questions or comments.

Sincerely,

James M. Levine

JML/SAB/RMW/rlh

cc: E. W. Merschoff
K. E. Perkins
M. B. Fields
J. H. Moorman

50-529
3/20/2000
See Rpt.

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A047 - OR Submittal: Inservice/Testing/Relief from ASME Code

Docket: 05000529

APS

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10CFR50.55a

102-04420–CDM/SAB/RKB
March 20, 2000

U.S. Nuclear Regulatory Commission
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Dear Sirs:

Reference:
1. APS Letter No. 102-04096-WEI/AKK/MLG, dated March 17, 1998, from W. E. Ide, APS, to NRC, "Unit 2 First 10-Year Inservice Inspection Program Revision."
2. APS Letter No. 102-04312-WEI/SAB/RKB, dated July 16, 1999, from W.E. Ide, APS, to NRC, "Unit 1 First 10-Year Interval Inservice Inspection (ISI) Program – Revision 2."
3. APS Letter No. 102-04354-CDM/SAB/RKB, dated October 6, 1999, from C. D. Mauldin, APS, to NRC, "Response to Unit 2 First 10-Year Interval Inservice Inspection Program – Request for Additional Information (RAI)."

Subject: **Palo Verde Nuclear Generating Station (PVNGS)**
Unit 2
Docket No. STN 50-529
Unit 2 First 10-Year Interval Inservice Inspection Program - Revision 3

In reference 1 above, pursuant to the requirements of 10 CFR 50.55a(g)(4) and 10 CFR 50.55a(g)(5)(i), Arizona Public Service Company (APS) submitted revision 2 to the PVNGS Unit 2 first 10-year interval Inservice Inspection (ISI) program. The revision documented the final status of the PVNGS Unit 2 first interval ISI program and was accompanied by several new or revised requests for relief.

In preparation of the final revision of the Unit 1 first 10-year ISI program, reference 2, APS identified minor changes to the Unit 2 first interval ISI program that were not included in the revision 2 submittal. Those changes are provided in enclosure 1.

APS also identified the need for an additional request for relief that was not included in the Unit 2 revision 2 submittal. Pursuant to the requirements of 10 CFR 50.55a(g)(5)(iv), APS hereby submits Relief Request No. 16 for the Unit 2 first 10-year interval ISI program.

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Relief Request No. 16, provided in enclosure 2, requests relief from the IWB-5210 and Table IWB-2500-1 requirements to perform VT-2 examinations of the reactor vessel at no less than normal operating pressure. This examination is impractical due to extreme temperatures and high radiation fields in certain areas requiring personnel occupancy in order to complete the exam. This relief request is identical to Relief Request No. 16 for the Unit 1 first 10-year interval ISI program submitted in reference 2, above.

Enclosure 3 contains the final summary report of the ISI examinations performed during the first 10-year inspection interval at PVNGS Unit 2 which began September 16, 1986 and was completed March 17, 1998. This report includes applicable examinations conducted after the seventh refueling outage and during the eighth refueling outage. Exams performed after the end of the interval included closure head studs and nuts, pressurizer longitudinal seam welds, valve body weld (UV654), integrally welded attachments, and the reactor head vent system. These exams were performed utilizing revised Relief Request Nos. 14 (reference 1) and 15 (reference 3), which are currently pending NRC Staff approval.

In summary, APS requests NRC Staff approval of Relief Request No. 16 for the first 10-year interval ISI program for Unit 2. In addition, APS is providing the Staff with Revision 3 pages and the final summary report for the Unit 2 first 10-year interval ISI program.

No commitments are being made to the NRC by this letter.

Should you have any questions, please contact Scott A. Bauer at (623) 393-5978.

Sincerely,

David Mauldin

CDM/SAB/RKB/

Enclosures

cc: E. W. Merschoff [Region IV Administrator]
M. B. Fields [NRR Project Manager]
J. H. Moorman [Sr. Resident Inspector]

12/17/99

Distribution Sheet

see Rpt.

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Docket: 05000529, Notes: Standardized plant.

MA2

APS

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10CFR50.55a

102-04385–CDM/AKK/RKB
December 17, 1999

U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Dear Sirs:

Reference: Letter No. 102-04309-WEI/AKK/RKB, dated July 15, 1999, from W. E. Ide, APS, to NRC.

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 2
Docket No. STN 50-529
Second Inservice Inspection Interval – Unit 2 Inservice Inspection Report Eighth Refueling Outage - Supplement

In the above referenced letter, Arizona Public Service Company (APS) submitted the PVNGS Unit 2 Inservice Inspection Report for the eighth refueling outage pursuant to 10 CFR 50.55a and IWA-6230 of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, 1989 Edition. However, the required NIS-2 forms were not included as part of that submittal. The completed NIS-2 forms for inservice inspection exams conducted during the PVNGS Unit 2 eighth refueling outage are enclosed.

No commitments are being made to the NRC by this letter.

Should you have any questions, please contact Scott A. Bauer at (623) 393-5978.

Sincerely,

David Mauldin

CDM/AKK/RKB/kg

Enclosure

A047

cc: E. W. Merschoff [Region IV Administrator]
M. B. Fields [NRR Project Manager]
J. H. Moorman [Senior Resident Inspector]

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