

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)





Palo Verde Nuclear  
Generating Station

James M. Levine  
Senior Vice President  
Nuclear

TEL (602)393-5300  
FAX (602)393-6077

Mail Station 7602  
P.O. Box 52034  
Phoenix, AZ 85072-2034

102-04212-JML/AKK/SAB/MLG  
November 23, 1998

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-37  
Washington, DC 20555-0001

Dear Sirs:

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

Reference: 1) APS Letter # 102-04060-JML/SAB/JRP, from James M.  
Levine to the NRC, dated January 13, 1998

Enclosed please find a revision to the APS Pump and Valve Inservice Testing Program, which is being submitted to the NRC staff in accordance with the recommendations of NUREG-1482, Guidelines for Inservice Testing at Nuclear Power Plants, April 1995. The attachment is revision 7 to Palo Verde Nuclear Generating Station procedure 73DP-9XI01, Pump and Valve Inservice Testing Program – Component Tables.

The enclosure supersedes the IST second 10-year program information submitted as Attachment 1 to Reference 1. The differences between Reference 1 and 73DP-9XI01 revision 7 include the following:

- 73DP-9XI01 rev. 7 lists certain tests that were not listed in Reference 1. These are tests that were performed during the first 10-year interval but no corresponding required safety function was identified during the 10-year update. PVNGS has taken the position that these tests will continue to be performed in the IST Program until additional reviews confirm that IST is not required.
- Alternate testing for the Containment Spray pumps and associated check valves is described in Pump Relief Request (PRR)-11, Cold Shutdown Justification (CSJ)-05 and Refueling Outage Justification (ROJ)-11. It has been determined that it is impractical to meet all applicable Code requirements when testing these components during power operation.

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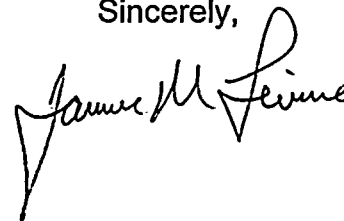
- PRR-08 has been revised to indicate that it is permissible to implement the alternate testing for smooth-running pumps on augmented pumps (pumps not required to be in IST) prior to NRC approval.
- Corrections and clarifications have been made to PRR-07 regarding charging pump vibration measurement.
- The test frequency of certain check valves verified closed by backflow testing has been changed from Quarterly (valves SIAVA10 and SIBVA15) and Cold Shutdown (valves SIAV997 and SIBV998) to Refueling. CSJ-25 has been deleted and ROJ-12 has been created accordingly.
- Other minor corrections, clarifications, and editorial changes that do not affect actual testing.

**The following commitments are being made to the NRC in this letter:**

APS is in the process of reviewing relief requests Valve Relief Request (VRR)-07, VRR-08, VRR-12, VRR-13, PRR-07, and PRR-08 and making appropriate revisions. The revised relief requests will be submitted to the NRC by December 11, 1998.

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

Sincerely,



JML/AKK/SAB/MLG/rjh  
Enclosure

cc: E. W. Merschhoff  
M. B. Fields  
J. H. Moorman



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**ENCLOSURE**

**PUMP AND VALVE INSERVICE TESTING PROGRAM-  
COMPONENT TABLES**

**REVISION 7**