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AUTH. NAME AUTHOR AFFILIATION

KRANINIK, A. Arizona Public Service Co. (formerly Arizona Nuclear Power

RECIP. NAME RECIPIENT AFFILIATION

Rules & Directives Review Branch (Post 920323)

SUBJECT: Comment on draft RG DG-1076, "Service Level I, II & III
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Commitment, Innovation, Energy

Palo Verde Nuclear
Generating Station

Angela K. Krainik
Director,
Regulatory Affairs

Tel. 623-393-5421
Fax 623-393-5442

Mail Station 7636
PO Box 52034
Phoenix, Arizona 85072-2034

102-04320-AKK/SAB/JAP
July 30, 1999

Rules and Directives Branch
Office of Administration
U. S. Nuclear Regulatory Commission
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
Comments on Draft Regulatory Guide DG-1076, "Service Level I, II, and
III Protective Coatings Applied to Nuclear Power Plants."**

Arizona Public Service Company (APS) submits the following comments in response to the Nuclear Regulatory Commission's (NRC) request for comments on Draft Regulatory Guide DG-1076, "Service Level I, II, and III Protective Coatings Applied to Nuclear Power Plants." (Federal Register: March 22, 1999, Volume 64, Number 54).

Arizona Public Service has participated in an industry effort with NEI to develop industry comments. Additionally, APS submits the following comments on this proposed draft regulatory guide.

Section C. Regulatory Position, item #2, of this proposed change lists definitions. There are no definitions related to Immersion Service where the coating failure could adversely affect the operation of the plant. Additionally, there should be a "Service Level IV" definition for Balance of Plant Coatings which are not covered in other service level definitions, will not affect plant operation, and can be applied as commercial coating work (painting). The following are the recommended changes to the Service Level I, II, and III coating definitions:

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A. Seahrz

64FR 13832

March 22, 1999

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1. The first part of the report is a general introduction to the subject of the study. It discusses the importance of the problem and the objectives of the research. It also mentions the methods used in the study and the results obtained.

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2. The second part of the report is a detailed description of the experimental work. It includes a description of the apparatus used, the procedure followed, and the results obtained. It also discusses the errors in the experiment and the conclusions drawn from the results.

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Rules and Directives Branch
Office of Administration
U. S. Nuclear Regulatory Commission
Comments on Draft Regulatory Guide DG-1076,
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Applied to Nuclear Power Plants"
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(2) Service Level I, II, III, and IV coating applications are defined as:

- Service Level I coating applications are used in areas where the coating failure could **impair safe shutdown, or could** adversely affect the operation of post-accident fluid systems. ~~and thereby impair safe shutdown.~~ With few exceptions, Service Level 1 applies to coatings inside primary containment.
- Service Level II coating applications are used ~~in areas where coatings failure could impair, but not prevent, normal operating performance. The functions of Service Level 2 coatings are to~~ provide corrosion protection and to improve the ability to decontaminate those areas outside primary containment that are subject to radiation exposure and radionuclide contamination.
- Service Level III coating applications are used on any ~~exposed~~ immersion surface area ~~located outside containment whose~~ failure could adversely affect normal plant operation or orderly and safe plant shutdown.
- Service Level IV or balance of plant coating applications are used for areas not covered in other Service Levels. These areas do not affect plant operations and coatings can be applied as commercial coating work (painting).

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

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

Sincerely,



AKK/SAB/JAP/rjh

cc: E. W. Merschhoff
N. Kalyanam
J. H. Moorman

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US NRC