



Palo Verde Nuclear Generating Station Third Interval Inservice Inspection (ISI) Pressure Testing

Relief Request 50 Pre-Submittal Call with NRC

Code Cases N-798 and N-800

December 12, 2017

Agenda

- Introduction
- Purpose
- ASME Code Section XI Requirements
- PVNGS ASME Section XI Third ISI Intervals
- Schedule
- Questions/Comments



Purpose

- Requesting relief from the requirements of IWB-5222 pursuant to 10 CFR 50.55a(z)(2) based upon the Code requirements representing a hardship or unusual difficulty without a compensating increase in the level of quality and safety
- Applies to ASME Code Class 1 pressure retaining components that are beyond the first normally closed valve to the second boundary component
- Requesting the use of Code Cases N-798 and N-800 as an alternative to the requirements of IWB-5222
- Precedents – Previous PVNGS ISI intervals and other plants
- Rulemaking to reflect Rev. 18 of RG 1.147 in 10 CFR 50.55a will obviate need for this relief request



ASME Code Section XI Requirements

- IWB-5222
 - (a) The pressure-retaining boundary during the system leakage test shall correspond to the reactor coolant boundary, with all valves in the position required for normal reactor operation startup. The visual examination shall, however, extend to and include the second closed valve at the boundary extremity.
 - (b) The Class 1 pressure-retaining boundary which is not pressurized when the system valves are in the position required for normal reactor startup shall be pressurized and examined at or near the end of the inspection interval. This boundary may be tested in its entirety or in portions and testing may be performed during the testing of the boundary of (a).
- Code Case N-798
 - Class 1 piping between the first and second vent, drain and test isolation devices that normally remain closed during plant operation.
- Code Case N-800
 - Alternative pressure testing requirements for Class 1 piping between first and second injection valves in the injection and return path of standby safety systems.



PVNGS ASME Section XI

Third ISI Intervals

Third Interval			
	Start	End	Allowable 1 year extension
Unit 1	7/18/2008	7/17/2018	7/17/2019
Unit 2	3/18/2007	3/17/2017	3/17/2018
Unit 3	1/11/2008	1/10/2018	1/10/2019

Notes:

- Relief Request (RR) 56 - Unit 2 Third 10-Year Inservice Inspection (ISI) Interval Extension (submitted November 10, 2017) would extend the end of the Unit 2 3rd ISI interval to October 31, 2018.
- Should 10 CFR 50.55a rulemaking be effective prior to October 17, 2018, or prior to October 31, 2018 if RR 56 is approved, APS would withdraw RR 50.



Schedule

- Planning to submit in December 2017
- NRC approval requested by March 17, 2018, if RR 56 is not approved, or by October 31, 2018, if RR 56 is approved



Questions/Comments

