Arizona Public Service Company
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February 8, 1984
NOLD 84-70

Mr. John B. Martin
Office of Inspection and Enforcement
Region V
U. S. Nuclear Regulatory Commission
1450 Maria Lane, Suite 210
Walnut Creek Plaza
Walnut Creek, CA 94596

Subject: Palo Verde Nuclear Generating Station
Units 1, 2, and 3
Fire Protection System: Post Indicator Valves
Docket Nos. STN-50-528/529/530
File: 84-019-026

Reference: Incoming letter from T. W. Bishop to G. C. Andognini dated December 13, 1983, same subject.

Dear Mr. Martin:

The above referenced letter identified several concerns which warranted APS management's attention. Following is APS's response to these items:

1. The unit 1 fire protection loop was transferred from Bechtel startup to APS preoperational testing in June 1983. The inspector saw correspondence from the insuring firm to APS stating acceptance of the underground fire protection system. The letter also identified the need for future preventtative maintenance (PM) work to keep the levels of rust and corrosion to a minimum. A review of the APS maintenance program for the valves and hydrants disclosed that system surveillances were still being developed and no preventative maintenance had been conducted on the valves and hydrants as yet.

   The Preventative Maintenance Program for the Fire Protection System utilized by the Operations and Maintenance Department has been based upon the ANI/MAELP recommended Fire Equipment Inspection, Testing, and Maintenance frequency schedule as well as the various technical manual recommendations of the vendors supplying the equipment.

   Preventative Maintenance activity is occurring on the Fire Protection System and the post indicator valves (PIV's) are specified in a surveillance test for an annual cycling frequency which conforms to the above recommended testing frequency.

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2. A potential problem with the fire loops has been identified by Bechtel Startup in that the amount of valve seat leakage of the various (PIV's) has been questioned.

   Although the initial Startup recommendations involved Preventative Maintenance recommendations, a review of previous activities and documentation has raised a concern relative to the initial flushing adequacy of the system, the water chemistry of the water and the corrosion rates within the system. A concerted effort by Startup, Operations Engineering, Maintenance and Operations is underway to develop answers to these questions. Since the Unit III piping loop is just now being transferred, a complete, high volume flush is being developed which will be followed by tests to identify any further PIV leakage problems. A completion date of April 30, 1984 has been established for the development of procedures by APS Startup to address the leakage problem.

3. A question relative to the transition of startup phase PM to operational phase PM has been raised.

   The Preventive Maintenance Program for PVNGS is addressing this issue by combining the Startup and Operations PM programs together under a single administrative organization. This group is presently reviewing the programs for potential breakdowns in PM coverage and will make these results available by March 31, 1984.

We feel that the completion of these activities will address the concerns identified in the referenced letter. If you have any further questions, please contact Todd Bloom at (602)-943-7200 extention 6139.

Sincerely,

E. E. Van Brunt, Jr.
APS Vice President, Nuclear
ANPP Project Director

EEVBJr/SRF/TJB/mb

cc: Director, Office of Nuclear Reactor Regulation
Director, Office of Inspection and Enforcement
NRC Resident Inspector - PVNGS
NRC Project Manager - PVNGS