

Arizona Public Service Company

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ANPP-30549-TDS/TRB

REGION VISE

U. S. Nuclear Regulatory Commission
Region V
Creskide Oaks Office Park
1450 Maria Lane - Suite 210
Walnut Creek, California 94596-5368

Attention: Mr. T. W. Bishop, Director
Division of Resident
Reactor Projects and Engineering Programs

Subject: Final Report - DER 84-30
A 50.55(e) Reportable Condition Relating to Improper
Documentation Of Diesel Generator Components.
File: 84-019-026; D.4.33.2

Reference: A) Telephone Conversation between P. Narbut and T. Bradish on
May 11, 1984
B) ANPP-29669, dated June 5, 1984 (Interim Report)
C) ANPP-30306, dated August 23, 1984 (Time Extension)

Dear Sir:

Attached is our final written report of the deficiency referenced above,
which has been determined to be Not Reportable under the requirements of
10CFR50.55(e).

Very truly yours,

E. E. Van Brunt

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

EEVE/TRB/nj
Attachment

cc: See Page Two

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Mr. T. W. Bishop
DER 84-30
Page Two

cc: Richard DeYoung, Director
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U. S. Nuclear Regulatory Commission
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FINAL REPORT - DER 84-30
DEFICIENCY EVALUATION 50.55(e)
ARIZONA PUBLIC SERVICE COMPANY (APS)
PVNGS UNITS 1, 2, 3

I. Description of Deficiency

Corrective Action Report (CAR) C83-186N reported that certain parts of the Diesel Generator package do not have ASME Section III documentation at the jobsite. The parts in question are within the ASME Code boundaries established by P&ID 13-M-DGP-001, Rev. 12, and the vendor (Cooper Energy Services). They are located on the Train A and B lube oil and jacket water heat exchanger subsystems. The parts that lack the code required documentation for each heat exchanger, as shown in the CAR, are listed below:

1. Four 1" dia. half couplings (these are for three thermowells and an isolation valve).
2. One reducing bushing.
3. One isolation valve. (PSPA V341, PSPA V342, PSPB V441, PSPB 442)
4. Two 3/4" dia. half couplings for vent and drain lines.
5. Six attachment welds for items 1 and 4 (half couplings).

The CAR was generated based on an ASME code documentation review of the Unit 2 diesel generators. The N-1 Manufacturer's Code Data Reports (American Standard Heat Transfer Division) for each of the items do not list these parts, nor is there any supporting documentation, i.e., material certifications, weld documentation, etc., available in the files.

In addition to the four isolation valves listed above, further investigation has found 26 other root valves not "N" stamped. These valves are also located on the jacket water and lube oil subsystems as well as one valve per train on the intercooler water outlet. The Unit 2 valves which do not conform to ASME Section III requirements, and have no traceability, are listed below by tag number:

<u>Train A</u>	<u>Train B</u>
2PSPAV340	2PSPBV440
2PSPAV341	2PSPBV441
2PSPAV342	2PSPBV442
2PDGAV503	2PDGBV603
2PDGAV504	2PDGBV604
2PDGAV506	2PDGBV606
2PDGAV507	2PDGBV607
2PDGAV508	2PDGBV608
2PDGAV509	2PDGBV609
2PDGAV511	2PDGBV611
2PDGAV512	2PDGBV612
2PDGAV513	2PDGBV613
2PDGAV514	2PDGBV614
2PDGAV515	2PDGBV615
2PDGAV516	2PDGBV616

Evaluation

With respect to the reducing bushing, in volume one of the vendor instruction manual, drawing KSV-58-7 parts list, item number 148 shows 15-1" x 1/2" bushings manufactured to ASME Section III requirements. Furthermore, the bushing, the four 1" and two 3/4" half couplings were examined at the supplier's facility by an authorized inspector. Quality Surveillance Reports (QSR) 123, 125, 126, 127, 157, and 164 found the code documentation to be satisfactory. QSR 121 and 124 stated that documentation for some half couplings was missing from the file. The missing documentation was later found, as recorded by QSR 215. Therefore, all required documentation for the bushing and the half couplings are satisfactory and on file at the supplier's facility.

Weld documentation for attaching the six half couplings is maintained at the supplier/sub-supplier's facility. ASME Code, Section III, Subsection ND, Paragraph ND-4322.1 allows maintenance of weld records by the manufacturer or installer or identification of welds by stamping. Therefore, the welding is in conformance with code.

It is the opinion of Cooper Energy Services (CES), the supplier of the root valves, that the valves listed above do not have to be ASME Section III, Class 3. Consequently, the root valves supplied for all 3 units were not N-stamped.

The root cause of this discrepancy is a difference in code interpretation which will ultimately be resolved by the ASME Committee.

II. Analysis of Safety Implications

Each valve has been stamped with a serial number by the vendor that is traceable back to a 500 psi pressure test performed on each valve. Additionally, the vendor inspected the valves under their Quality Control Inspection Plan QC/IP-01V-2 Rev. 2, sheets 1 and 2. Attached to the plan is a valve drawing which notes that the maximum valve test pressure is 10,000 psi (the valves are installed in a 100 psi system).

Based on the above, this condition is evaluated as not reportable under the requirements of 10CFR50.55(e) and Part 21; since, if left uncorrected, it would not represent a significant safety hazard.

Since the evaluation conducted by Bechtel Engineering concluded that the instrument root valves are included under code jurisdiction, CES has been asked via Bechtel letter B/CES-E-48254, dated May 24, 1984 to provide a formal, written justification from ASME that permits the use of these non-ASME stamped root valves on the diesel generator systems.

III. Corrective Action

As a result of the review of all code-related documentation generated for the bushings, couplings and attachment welds, it is concluded that all ASME III, Class 3 documentation and certifications are correct and on file at the supplier's facility. Therefore, the 1" and 3/4" half couplings, the reducing bushings, and the attachment welds are dispositioned "use-as-is."

With respect to the root valves, NCR SM-4593 was written to document the nonconformance. An interim disposition has been given to the NCR to replace the 30 Unit 1 ASME III stamped isolation valves with 3/8" stamped valves. This valve replacement will be completed prior to Unit 1 fuel load. Concurrently, the vendor has written to the ASME Committee for a code clarification. Upon receipt of the clarification, Units 1, 2, and 3 will be modified as required by the ASME Committee.

Since the discrepancy involves code interpretation, not valve integrity, no procedural changes or detailed investigations are required.