



## Arizona Nuclear Power Project

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U. S. Nuclear Regulatory Commission  
Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, CA 94596-5368

ANPP-31121-EEVBJr/SRF  
November 14, 1984

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Dockets Nos. STN 50-528/529/530  
File: 84-055-026

Reference: NRC IE Bulletin 84-03 Refueling Cavity Water Seal

Dear Mr. Martin:

IE Bulletin 84-03 requested licensees to evaluate the potential for and consequences of a refueling cavity water seal failure. This was to be completed by plants prior to beginning refueling or within 90 days of receipt of this bulletin.

After reviewing our present status, we are requesting an extension until the end of February 1985 to respond to IE Bulletin 84-03 for the following reasons:

- 1) We plan to participate in an INPO meeting scheduled for late November/early December with various utilities to discuss this issue.
- 2) Since a modification is very likely, we would like the opportunity to determine the most viable long term solution to this issue.

By requesting this extension we will not increase the probability of risk to the health and safety of the public or ANPP employees since we do not have any irradiated fuel in the reactor, nor in the spent fuel pool. Although initial fuel load for PVNGS is rapidly approaching, we will be performing a "dry" fuel load in which the borated water level will lie below the reactor vessel flange and the seal.

The earliest possible unanticipated need for the fuel pool and the seal for Unit 1 could not result until we have achieved initial criticality. We expect to have resolved this issue prior to that time frame.

If you have any questions please contact me.

Very truly yours,

*E E Van Brunt* *DSK*

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

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