ODCM 2.1

APS A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear Generating Station

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102-06283-DCM/KAC
November 22, 2010

ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 3
Docket No. STN 50-530
License No. NPF-51
Special Report 3-SR-2010-001-00

Attached please find Special Report 3-SR-2010-001-00, which is prepared and submitted pursuant to PVNGS Offsite Dose Calculation Manual (ODCM) requirements. This report discusses the inoperability of a fuel building ventilation system high range radioactive gaseous effluent monitor for more than 72 hours.

By copy of this letter and the attachment, this report is being provided to the NRC Region IV Administrator and the PVNGS Resident Inspector.

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

Should you need further information regarding this submittal, please contact Marianne Webb, Compliance Section Leader, at (623) 393-5730.

Sincerely,

DCM/MNW/KC/gat
Enclosure

Special Report 3-SR-2010-001-00, Fuel Building Ventilation System High Range Radioactive Gaseous Effluent Monitor Inoperable

cc: (with enclosure)
E. E. Collins Jr. NRC Region IV Regional Administrator
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Enclosure

Special Report 3-SR-2010-001-00

Fuel Building Ventilation System High Range Radioactive Gaseous Effluent Monitor Inoperable

Palo Verde Nuclear Generating Station

Special Report 3-SR-2010-001-00

Fuel Building Ventilation System High Range Radioactive Gaseous Effluent Monitor Inoperable

Docket No. STN 50-530, Unit 3

Reporting Requirement:

The PVNGS Offsite Dose Calculation Manual (ODCM) contains operability requirements for radioactive gaseous effluent monitoring instrumentation in Section 2.1, "Requirements: Gaseous Monitors." Action 42 for Table 2-1, Item 5, "Fuel Building Ventilation System," specifies that when the number of OPERABLE High Range Monitors is less than required by the Minimum Channels OPERABLE requirement, and the required monitor is not restored to OPERABLE status within 72 hours, then the associated actions are to:

a) Initiate the Preplanned Alternate Sampling Program to monitor the appropriate parameter(s) when it is needed.

b) Prepare and submit a Special Report to the Commission within 30 days following the event outlining the action(s) taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.

Initial Conditions:

At 1405 Mountain Standard Time (MST) on October 21, 2010, Unit 3 was in a refueling outage, with the core off-loaded to the spent fuel pool. The fuel building ventilation system high range radioactive gaseous effluent monitor (RU-146) was declared inoperable due to its 120 VAC Class 1E power supply (PNB-D26) being removed from service.
RU-146 was not restored to OPERABLE status within 72 hours.

Actions Taken:

The Preplanned Alternate Sampling Program was initiated pursuant to the ODCM Requirement 2.1, ACTION 42(a) on October 24, 2010, at 1405 MST. On October 28, 2010, at 0845 MST, RU-146 was declared OPERABLE after restoration of power and completion of the channel check surveillance test. There were no radiation level anomalies recorded during the compensatory period that alternate sampling was in place.

Cause of the Inoperability:

There was no monitor malfunction associated with the inoperability of RU-146. The cause for exceeding the 72 hours allowed by ODCM 2.1, Action 42(b), was primarily due to the voluntary implementation of a modification to improve the reliability of inverter (PNB-N12) during a time that imposed minimum risk impact to the station. The inverter, the associated Class IE 125vdc bus, and therefore monitor RU-146, were specifically removed from service at a time when the reactor was defueled. This modification was scheduled to work 24/7 during a refueling outage because the scope of this work cannot be performed when the unit is operating. The cumulative effect of the work resulted in RU-146 being out of service for 162 hours and 40 minutes.

Plans and Schedule for Restoring the Channels to OPERABLE Status:

On October 28, 2010, at 0845 MST, RU-146 was declared OPERABLE after completion of the channel check surveillance test.