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102-07817-MLL/SPD
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ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Sirs:

Subject: **Palo Verde Nuclear Generating Station (PVNGS) Unit 2**
Docket No. STN 50-529 / License No. NPF 51
Special Report 2-SR-2018-001-00

Enclosed please find Special Report 2-SR-2018-001-00, which is prepared and submitted pursuant to PVNGS Offsite Dose Calculation Manual requirements. This report discusses the nonfunctionality of a fuel building ventilation system high range radioactive gaseous effluent monitor for more than 7 days.

Copies of this Special Report are being forwarded to the Nuclear Regulatory Commission (NRC), NRC Region IV, and the Senior Resident Inspector.

Arizona Public Service Company makes no commitments in this letter. If you have questions regarding this submittal, please contact Matthew Kura, Department Leader, Nuclear Regulatory Affairs, at (623) 393-5379.

Sincerely,

A handwritten signature in blue ink that reads "Maria Lecal".

MLL/SPD

Enclosure:

Special Report 2-SR-2018-001-00, Fuel Building Ventilation System High Range Radioactive Gaseous Effluent Monitor Nonfunctional

cc: K. M. Kennedy NRC Region IV Regional Administrator
M. D. Orenak NRC NRR Project Manager for PVNGS
C. A. Peabody NRC Senior Resident Inspector PVNGS

Enclosure

Special Report 2-SR-2018-001-00

**Fuel Building Ventilation System High Range Radioactive Gaseous
Effluent Monitor Nonfunctional**

Palo Verde Nuclear Generating Station

Special Report 2-SR-2018-001-00

Fuel Building Ventilation System High Range Radioactive Gaseous Effluent Monitor Nonfunctional Docket No. STN 50-529, Unit 2

Reporting Requirement:

The Palo Verde Nuclear Generating Station Offsite Dose Calculation Manual revision 27 (ODCM) includes functionality requirements for radioactive gaseous effluent monitoring instrumentation. Action 42 of Table 2-1, specifies the following: " With the number of channels FUNCTIONAL less than required by the Minimum Channels FUNCTIONAL requirement, initiate the Preplanned Alternate Sampling Program to monitor the appropriate parameter(s) within 72 hours, and:

- a) Either restore the nonfunctional channel(s) to FUNCTIONAL status within 7 days of the event, or
- b) Prepare and submit a Special Report to the Commission within 14 days following the event outlining the action(s) taken, the cause of the nonfunctionality, and the plans and schedule for restoring the system to FUNCTIONAL status."

Initial Conditions:

At 0845 Mountain Standard Time (MST) on October 15, 2018, Unit 2 was in a refueling outage. The fuel building ventilation system high range radioactive gaseous effluent monitor (RU-146) was declared nonfunctional at this time due to its 120 VAC Class 1E power supply being removed from service in support of a unit modification.

RU-146 was not restored to FUNCTIONAL status within 7 days.

Actions Taken:

The Preplanned Alternate Sampling Program was initiated to "monitor appropriate parameters" pursuant to ODCM Requirement ACTION 42 of Table 2-1 on October 13, 2018, at 1555 MST, in anticipation of the planned 120 VAC Class 1E power supply outage. On October 23, 2018 at 1159 MST, RU-146 was declared FUNCTIONAL after restoration of power and completion of the channel check surveillance test.

Cause of the Nonfunctionality:

There was no monitor malfunction associated with the nonfunctionality of RU-146. The cause for exceeding the 7 days allowed by ODCM Action 42 of Table 2-1 was due to the schedule being extended during the implementation of a modification to improve the reliability of the 120 VAC inverters that supply power to RU-146. The cumulative effect of the work performed resulted in RU-146 being out of service for greater than 7 days.

Palo Verde Nuclear Generating Station

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Plans and Schedule for Restoring the System to FUNCTIONAL Status:

On October 23, 2018 at 1159 MST, RU-146 was declared FUNCTIONAL following completion of the modification work and after completion of the channel check surveillance test.