



Palo Verde Nuclear
Generating Station

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102-05404-CDM/TNW/RKR
January 25, 2006

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

Reference: Letter 102-05223, dated March 4, 2005, from D. Mauldin, APS, to NRC, "Request for Amendment to Facility Operating Licenses NPF-41, NPF-51 and NPF-74 to License Condition 2.F (2.G in Unit 3) and Request for Amendment to Technical Specifications: 1.4, 'Frequency,' 2.1.1, 'Reactor Core SLs,' 3.1.10, 'Special Test Exceptions (STE) – MODES 1 and 2,' 3.3.1, 'Reactor Protective System (RPS) Instrumentation - Operating,' 3.4.3, 'RCS Pressure and Temperature (P/T) Limits,' 3.7.2, 'Main Steam Isolation Valves (MSIVs),' 3.7.3, 'Main Feedwater Isolation Valves (MFIVs),' 3.8.1, 'AC Sources – Operating,' 3.8.4, 'DC Sources – Operating,' 3.8.6, 'Battery Cell Parameters,' and 5.5.9, 'Steam Generator (SG) Tube Surveillance Program' "

Dear Sirs:

Subject: Supplement to Provide Updated Technical Specification Pages for the Proposed Operating License Amendment Submitted to the NRC on March 4, 2005 (letter no. 102-05223)

In the referenced letter, Arizona Public Service Company (APS) submitted to NRC a request to amend PVNGS Technical Specifications (TS). Since that submittal, the NRC issued Amendment No. 156 to PVNGS Units 1, 2, and 3. That resulted in the need to update a TS page in the referenced letter. In addition, four of the submitted pages have editorial errors that should be corrected prior to issue of the proposed amendment.

Enclosed are revised proposed retyped TS pages 2.0-1, 3.7.3-1, 3.8.4-2, 3.8.4-4, and 5.5-15. These pages include the changes proposed in the referenced letter amendment request and the changes approved in Amendment No. 156. No new TS changes are being proposed by this letter. Please use these pages in place of the pages submitted in the referenced TS amendment request letter.

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

Should you have any questions, please contact Thomas N. Weber at (623) 393-5764.

Sincerely,

A handwritten signature in black ink, appearing to read "David Pauldin". The signature is fluid and cursive, with the first name "David" and last name "Pauldin" clearly distinguishable.

CDM/TNW/RKR/ca

Enclosures:

- Enclosure 1 - Notarized Affidavit
- Enclosure 2 - Revised Proposed Retyped TS Pages 2.0-1, 3.7.3-1, 3.8.4-2, 3.8.4-4, and 5.5-15

cc:	B. S. Mallett	NRC Region IV Regional Administrator
	M. B. Fields	NRC NRR Project Manager
	G. G. Warnick	NRC Senior Resident Inspector for PVNGS
	A. V. Godwin	Arizona Radiation Regulatory Agency (ARRA)

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, David Mauldin, represent that I am Vice President Nuclear Engineering and Support, Arizona Public Service Company (APS), that the foregoing document has been signed by me on behalf of APS with full authority to do so, and that to the best of my knowledge and belief, the statements made therein are true and correct.

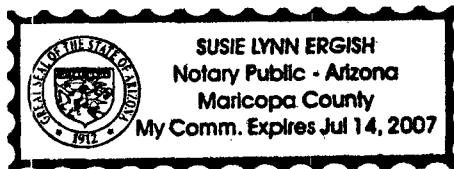


David Mauldin

Sworn To Before Me This 25th Day Of January, 2006.



Notary Public



Notary Commission Stamp

Enclosure 2

**Revised Proposed Retyped
TS Pages 2.0-1, 3.7.3-1, 3.8.4-2, 3.8.4-4, and 5.5-15**

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

- 2.1.1.1 In MODES 1 and 2, Departure from Nucleate Boiling Ratio (DNBR) shall be maintained at ≥ 1.34 .
- 2.1.1.2 In MODES 1 and 2, the peak fuel centerline temperature shall be maintained $< 5080^{\circ}\text{F}$ (decreasing by 58°F per 10,000 MWD/MTU for burnup and adjusting for burnable poisons per CENPD-382-P-A).

2.1.2 Reactor Coolant System (RCS) Pressure SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained at ≤ 2750 psia.

2.2 SL Violations

- 2.2.1 If SL 2.1.1.1 or SL 2.1.1.2 is violated, restore compliance and be in MODE 3 within 1 hour.
- 2.2.2 If SL 2.1.2 is violated:
 - 2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.
 - 2.2.2.2 In MODE 3, 4, or 5, restore compliance within 5 minutes.
- 2.2.3 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.
- 2.2.4 Within 24 hours, notify the Director, Operations and the Senior Vice President, Nuclear.

(continued)

3.7 PLANT SYSTEMS

3.7.3 Main Feedwater Isolation Valves (MFIVs)

LCO 3.7.3 Four economizer MFIVs and four downcomer MFIVs shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4 except when MFIV is closed and deactivated or isolated by a closed and deactivated power operated valve.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each penetration flow path.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more MFIVs inoperable.	A.1 Close or isolate inoperable MFIV.	72 hours
	<u>AND</u> A.2 Verify inoperable MFIV is closed or isolated.	Once per 7 days
B. Two valves in the same flow path inoperable.	B.1 Isolate affected flow path.	8 hours
	<u>AND</u> B.2 Verify inoperable MFIV is closed or isolated.	Once per 7 days

(continued)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.4.1	Verify battery terminal voltage is ≥ 129 V on float charge.	7 days
SR 3.8.4.2	Verify no visible corrosion at battery terminals and connectors. <u>OR</u> Verify battery connection resistance is $\leq 150\text{E-}6$ ohms for inter-cell connections. $\leq 150\text{E-}6$ ohms for inter-rack connections. $\leq 150\text{E-}6$ ohms for inter-tier connections. and $\leq 150\text{E-}6$ ohms for terminal connections.	92 days
SR 3.8.4.3	Verify battery cells, cell plates, and racks show no visual indication of physical damage or abnormal deterioration that could degrade battery performance.	18 months
SR 3.8.4.4	Remove visible terminal corrosion and verify battery cell to cell and terminal connections are clean, and are coated with anti-corrosion material.	18 months
SR 3.8.4.5	Verify battery connection resistance is $\leq 150\text{E-}6$ ohms for inter-cell connections. $\leq 150\text{E-}6$ ohms for inter-rack connections. $\leq 150\text{E-}6$ ohms for inter-tier connections. and $\leq 150\text{E-}6$ ohms for terminal connections.	18 months

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.4.8 -----NOTE----- This Surveillance shall not be performed in MODE 1, 2, 3, or 4. -----</p> <p>Verify battery capacity is $\geq 80\%$ of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test.</p>	<p>60 months</p> <p><u>AND</u></p> <p>12 months when battery shows degradation or has reached 85% of the expected life with capacity < 100% of manufacturer's rating</p> <p><u>AND</u></p> <p>24 months when battery has reached 85% of the expected life with capacity $\geq 100\%$ of manufacturer's rating</p>

TABLE 5.5.9-2
STEAM GENERATOR TUBE INSPECTION

1ST SAMPLE INSPECTION			2ND SAMPLE INSPECTION		3RD SAMPLE INSPECTION	
Sample Size	Result	Action Required	Result	Action Required	Result	Action Required
A minimum of S Tubes per S.G	C-1	None	N.A.	N.A.	N.A.	N.A.
	C-2	Plug or repair defective tubes and inspect additional 2S tubes in this S.G.	C-1	None	N.A.	N.A.
			C-2	Plug or repair defective tubes and inspect additional 4S tubes in this S.G.	C-1	None
					C-2	Plug or repair defective tubes
					C-3	Perform action for C-3 result of first sample
			C-3	Perform action for C-3 result of first sample	N.A.	N.A.
	C-3	Inspect all tubes in this S.G., plug or repair defective tubes and inspect 2S tubes in each other S.G. Notification to NRC pursuant to 10 CFR 50.72 (b)(3)	All other S.G.s are C-1	None	N.A.	N.A.
			Some S.G.s C-2 but no additional S.G. are C-3	Perform action for C-2 result of second sample	N.A.	N.A.
			Additional S.G. is C-3	Inspect all tubes in each S.G. and plug or repair defective tubes. Notification to NRC pursuant to 10 CFR 50.72 (b)(3)	N.A.	N.A.

$S = 3 \frac{N}{n} \%$ Where N is the number of steam generators in the unit, and n is the number of steam generators inspected during an inspection.