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 FACIL: STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publ 05000528
 AUTH. NAME AUTHOR AFFILIATION
 VAN BRUNT, E.E. Arizona Public Service Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for amend to License NPF-34, changing Tech Spec
 Table 3.3-5 to reflect containment spray pump up to rated
 speed response time to support power ascension program
 schedule. Fee paid.

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Arizona Nuclear Power Project

P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

ANPP-32389-EEVB/WFQ

April 12, 1985

Director of Nuclear Regulation
Mr. Harold R. Denton
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528 (License No. NPF-34)/529/530
Request for License Technical Specification Correction
File: 85-056-026; G.1.01.10

Reference: Letter from E. E. Van Brunt, Jr., ANPP, to H. Denton, NRC,
(ANPP-32373) dated April 11, 1985; Subject: Request for
License Technical Specification Correction

Dear Mr. Denton:

Per conversations with your staff on April 10 and 11, 1985, submitted herewith is a request for an Emergency Technical Specification Change. This change is required in an expeditious manner to support the present PVNGS Unit 1 Power Ascension Program schedule. Enclosed within this package request is:

- a. Description of the Proposed Change Request
- b. Marked-up Technical Specification Change Page
- c. Justification for Emergency Classification
- d. Safety Evaluation of the Proposed Amendment Request
- e. Significant Hazards Consideration Determination
- f. Environmental Impact Consideration Determination
- g. Discussion of the need for No Compensatory Measures

In accordance with 10CFR170.12(c), the license amendment application fee of \$150.00 is also enclosed. Your approval of this request is required by Monday, April 15, 1985, in order not to delay our present schedule for Mode 4 entry.

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PDR ADDCK 05000528
P PDR

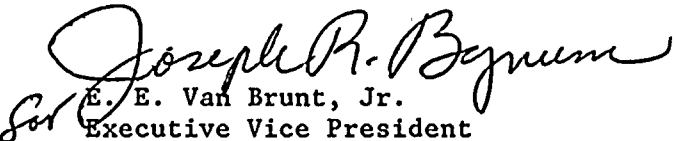
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APR 11

ANPP-32389
April 12, 1985
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If you have any questions, please contact W. F. Quinn of my staff.

Very truly yours,


E. E. Van Brunt, Jr.
Executive Vice President
Project Director

EEVB/WFQ/jdf

Enclosure

cc: E. A. Licitra (w/attachment)
G. W. Knighton (w/attachment)
R. P. Zimmerman (w/attachment)
A. C. Gehr (w/attachment)
C. F. Tedford - Arizona Radiation Regulatory Agency
(w/attachment)

ENCLOSURE

DESCRIPTION OF PROPOSED AMENDMENT REQUEST

Table 3.3-5, Item 3.e of the PVNGS Unit 1 Technical Specifications is proposed to be changed to reflect the Containment Spray Pump up-to-rated speed response times of "33*/23*"* (see attached marked up Technical Specification page 3/4 3-29). The proposed response times are consistent with the accident analyses as presented in FSAR Section 6.2.1.

JUSTIFICATION FOR EMERGENCY CLASSIFICATION

On April 9, 1985 during testing of the Containment Spray Pumps in preparation for entry into Mode 4, it was determined that the Engineered Safety Features response times for the pumps to reach rated speed was greater than that allowed by Technical Specification Table 3.3-5, Item 3.e. Investigation revealed that the valves presented in the Technical Specification were not consistent with the accident analyses as presented in FSAR Section 6.2.1. This is an emergency change request since failure to allow this change to be made as an emergency situation will delay entry into Mode 4 during the present power ascension program. Mode 4 entry is presently scheduled for April 16, 1985. The need for a correction to this Technical Specification was not obvious since development of the response times required a calculation of timing sequences to determine the total response time.

SAFETY EVALUATION OF PROPOSED AMENDMENT REQUEST

The change to Table 3.3-5, Item 3.e will provide consistency between the Safety Analyses and Technical Specifications. The probability of occurrence or consequences of an accident or malfunction of equipment will be consistent with that which was previously analyzed and the margin of safety will be maintained.

SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed amendment request does not involve a Significant Hazards Consideration because:

- A) Operation of PVNGS Unit 1 in accordance with this change would not:
 - 1. Involve a significant increase in the probability or consequences of an accident previously analyzed; or
 - 2. Create the possibility of a new or different kind of accident from any accident previously analyzed; or
 - 3. Involve a significant reduction in a margin of safety; and
- B) The proposed change matches the example cited in 48FR14864; i.e., the proposed change involves a purely administrative change to Technical Specifications in that it provides for correction of an error to achieve consistency between the Final Safety Analysis Report and Technical Specifications.

ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed amendment request does not involve an unreviewed environmental question because operation of PVNGS Unit 1 in accordance with this change would not:

1. Result in a significant increase in any adverse environmental impact previously evaluated in the Final Environmental Statement (FES) as modified by staff's testimony to the Atomic Safety and Licensing Board, Supplements to the FES, Environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or
2. Result in a significant change in effluents or power levels; or
3. Result in matter not previously reviewed in the licensing basis for PVNGS which may have a significant environmental impact.

PROPOSED COMPENSATORY MEASURES

There are no proposed compensatory measures which could be used in lieu of this technical specification change. There are no additional or new components to be added to PVNGS for this technical specification change.

