

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8507170230 DOC. DATE: 85/07/15 NOTARIZED: NO DOCKET #
 FACIL: STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Public 05000528
 AUTH. NAME AUTHOR AFFILIATION
 VAN BRUNT, E.E. Arizona Public Service Co.
 RECIP. NAME RECIPIENT AFFILIATION
 KNIGHTON, G. Licensing Branch 3

SUBJECT: Application for amend to License NPF-41, requesting emergency one-time only change of Tech Spec 3.4.5.2 re RCS operational leakage to allow for addl 72 h in Mode 2 in order to identify RCS leakage which began 850711. Fee paid.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4+2
 TITLE: OR Submittal: General Distribution

NOTES: Standardized plant.
 OL: 12/31/84

05000528

RECIPIENT			COPIES		RECIPIENT			COPIES	
ID	CODE/NAME		LTTR	ENCL	ID	CODE/NAME	LTTR	ENCL	
NRR	LB3 BC	01	7	7					
INTERNAL:	ACRS	09	6	6	ADM/LFMB		1	0	
	ELD/HDS3		1	0	NRR/DE/MTEB		1	1	
	NRR/DL DIR		1	1	NRR/DL/ORAB		1	0	
	NRR/DL/TSRG		1	1	NRR/DSI/METB		1	1	
	NRR/DSI/RAB		1	1	REG FILE	04	1	1	
	RGNS		1	1					
EXTERNAL:	24X		1	1	EG&G BRUSKE, S		1	1	
	LPDR	03	1	1	NRC PDR	02	1	1	
	NSIC	05	1	1					

Rec'd w/ check \$150.00
 # 001602

TOTAL NUMBER OF COPIES REQUIRED: LTTR 28 ENCL 25

1. The first step in the process of identifying a potential threat is to determine the nature of the threat. This can be done by reviewing the threat's history, its current status, and its potential impact on the organization. Once the nature of the threat has been identified, the next step is to assess the threat's risk. This involves evaluating the likelihood of the threat occurring and the potential consequences if it does. Finally, the third step is to develop a response plan. This plan should outline the steps that will be taken to prevent the threat from occurring, to detect it if it does occur, and to respond to it if it does occur.

-----; 89E -- 060 -- 70-1049 2100S 410A : 000 11H 1281B
 -----; 89E -- 060 -- 70-1049 2100S 410A : 000 11H 1281B

L'Espresso

[illegible]



Arizona Nuclear Power Project

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

Director of Nuclear Reactor Regulation
Attention: Mr. George Knighton, Chief
Licensing Branch No. 3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

July 15, 1985
ANPP-33030

Subject: Palo Verde Nuclear Generating Station
Unit 1
Docket No. STN 50-528 (License No. NPF-41)
Request for Emergency Technical Specification Change
File: 85-056-026; G.1.01.10

Reference: Letter from E. E. Van Brunt, Jr., APS, to G. W. Knighton, NRC, dated July 12, 1985 (ANPP-33008); Subject: Request for Emergency Technical Specification Change.

Dear Mr. Knighton:

Per conversation with your staff on July 12, 1985, submitted herewith is a supplement to the referenced one-time only Emergency Technical Specification Change. This change is required expeditiously due to the nature of the unidentified leak which we have experienced in order to provide the most effective manner in which to determine the leak. 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. Proposed Compensatory Measures

In accordance with 10CFR 170.12(c), the license amendment application fee of \$150.00 is also enclosed.

If you have any questions, please contact Mr. W. F. Quinn of my staff.

Very truly yours,

E E Van Brunt / DBK

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

8507170230 850715
PDR ADDCK 05000528
PDR

EEVB/WFQ/slh
Enclosure

cc: E. A. Licitra (all w/a)
R. P. Zimmerman
A. C. Gehr
C. F. Tedford, Arizona Radiation Regulatory Agency

Rec'd w/ check \$150.00
#001602



10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29

30

31

32

33

34

35

G. W. Knighton
Request for Emergency Technical Specification Change
ANPP-33030
Page 2

bcc: D. B. Karner (all w/a)
R. M. Butler
T. F. Quan
O. J. Zeringue
J. R. Bynum
S. R. Frost
D. Cannady
J. Haynes
A. C. Rogers



11

11

11

DESCRIPTION OF PROPOSED AMENDMENT REQUEST

Technical Specification 3.5.4.2, Action Statement b was entered into on July 11, 1985, based on the determination of unidentified Reactor Coolant System leakage of 1.2 gpm. The plant has been taken to Mode 2 and will enter Mode 5 within 30 hours as required by the Action Statement. However, for a one time only change, we request that we be allowed an additional 72 hours in Mode 2 prior to entering Mode 5 in order to: 1) allow additional "at-pressure" time for ascertaining the location of the leak (if one exists), and 2) provide additional time for collecting additional RCS inventory data to verify the RCS inventory calculations. If the RCS leakage is determined to increase to greater than 2 gpm within the requested 72 hour extension, based on inventory surveillance at least every 8 hours, PVNGS Unit 1 will proceed immediately to Mode 5. Attached marked-up Technical Specification page 3/4 4-19 indicates this proposed one-time only change.

JUSTIFICATION FOR EMERGENCY CLASSIFICATION

The unidentified leakage which has been determined to exist has not been located at this time. It is speculated that the leakage may be intersystem. In order to locate the leakage, the system must be at some pressure to produce the pressure differential to promote the leakage. Therefore, it is necessary to remain above Mode 5 to ensure positive identification of the leakage can be ascertained. In addition, verification of RCS inventory calculations require that reproducible data and leakage paths remain constant. In order to achieve the above, a suspension of the pre-noticing requirements of 10CFR50.91 is required and expeditious granting of the proposed one-time only change be effected.

SAFETY EVALUATION OF PROPOSED AMENDMENT REQUEST

The requested one-time only change to the time requirements of Technical Specification 3.5.4.2, Action Statement b will not increase the probability or consequences of any accident or malfunction of equipment, nor will it reduce any margin of safety as defined in the basis to any Technical Specification. The RCS activity at the time of our discussions was $2.1 \times 10^{-2} \mu\text{Ci/cc}$ which is approximately 200 times less than that assumed in the accident analyses (refer to CESSAR Section 15.6.3.1.3.2 which assumes a primary activity of $4.6 \mu\text{Ci/gm}$). Therefore, the margin of safety is maintained and the probability and consequences of any accident is not increased.

SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed one-time only 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

[illegible]

" 3 1

Figure 1. The effect of the concentration of the *Agrobacterium* suspension on the transformation efficiency of *Agrobacterium* strains.

4. *Journal of the American Medical Association*, 1997; 277: 1033-1038.

4 / 1 3 5 6 7 8 9

1. *Journal of the American Medical Association*, 1997; 277: 1033-1038.

4. 1. 1.

1990		1991		1992		1993		1994		1995		1996		1997		1998		1999		2000		2001		2002		2003		2004		2005		2006		2007		2008		2009		2010		2011		2012		2013		2014		2015		2016		2017		2018		2019		2020		2021		2022		2023		2024		2025		2026		2027		2028		2029		2030		2031		2032		2033		2034		2035		2036		2037		2038		2039		2040		2041		2042		2043		2044		2045		2046		2047		2048		2049		2050		2051		2052		2053		2054		2055		2056		2057		2058		2059		2060		2061		2062		2063		2064		2065		2066		2067		2068		2069		2070		2071		2072		2073		2074		2075		2076		2077		2078		2079		2080		2081		2082		2083		2084		2085		2086		2087		2088		2089		2090		2091		2092		2093		2094		2095		2096		2097		2098		2099		2100	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100																																																																																																																										

b **d**

L. J. ...

[illegible]

1. *W*

1. The first group of authors (e.g., [1, 2]) considers the problem of the stability of the motion of a system of particles in the field of a central body. The results of the calculations show that the motion of the particles is stable for a wide range of initial conditions.

3. Involve a significant reduction in the margin of safety; and
- B) The change does not allow exiting from the design basis envelopes for any accident analyses based on the plant specific primary coolant activity which will be experienced during the time period that the one-time only Technical Specification change will be in effect.

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 matters not previously reviewed in the licensing basis for PVNGS which may have a significant environmental impact.

PROPOSED COMPENSATORY MEASURES

There are no other compensatory measures proposed which are not already cited in the request for change. The upper limit on unidentified RCS leakage during the requested time extension in conjunction with the RCS sampling frequency to be imposed during this period provide sufficient compensatory measures to maintain protection of the public health and safety.

