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 Publi 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. 05000528
OL:12/31/84

	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES 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
	RGN5		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
#00602

TOTAL NUMBER OF COPIES REQUIRED: LTTR 28 ENCL 25

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 acccordance 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,

EEVanBrunt/DBK

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

EEVB/WFQ/slh
Enclosure

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

A001
1/1

Rec'd w/check $150.00
#001602

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

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 2.1×10^{-2} μCi/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 μCi/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

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.