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RECIP.NAME RECIPIENT AFFILIATION
KNIGHTON,G.W. Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests one-time change to Tech Specs allowing performance of required environ qualification mods to hydrogen recombiners,per request for extension of 851130 deadline for qualification.

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Arizona Nuclear Power Project
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November 19, 1985
ANPP 34043 EEVB/BJA

Director of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Project Director
PWR Project Directorate #7
Division of Pressurized Water Reactor Licensing-B
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1 and 2
Docket Nos. STN 50-528 (License No. NPF-41)/529
Technical Specification Amendment Request for
Hydrogen Recombiner E.Q. Modifications
File: 85-056-026; G.1.01.10

References: (A) Letter from E. E. Van Brunt, Jr., ANPP, to G. W. Knighton, NRC, dated September 30, 1985 (ANPP-33605). Subject: Extension Request for Environmental Qualification of Hydrogen Recombiners.
(B) Letter from E. E. Van Brunt, Jr., ANPP, to G. W. Knighton, NRC, dated October 16, 1985 (ANPP-33735). Subject: Operating License Amendment Request for Environmental Qualification.

Dear Mr. Knighton:

The letter of Reference (A) submitted a request for an extension from the implementation deadline of November 30, 1985, for the environmental qualification of the Hydrogen Recombiners at PVNGS. Reference (A) also contained a Justification for Continued Safe Operation (JCO) which presented the basis for the extension request. This letter is a formal request for a one-time change to the PVNGS Units 1 and 2 Technical Specifications which will allow PVNGS to perform the required environmental qualification modifications to the Hydrogen Recombiners. This change will allow PVNGS to expediently implement the requirements of 10 CFR 50.49 for the Hydrogen Recombiners. Enclosed within this amendment request package are the following:

A. Description of the Proposed Change
B. Marked-up Technical Specification Change Page
C. Safety Evaluation for the Proposed Change
D. Significant Hazards Consideration Determination
E. Proposed Compensatory Measures
F. Environmental Impact Consideration Determination

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

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

Very truly yours,

EE Van Brunt Jr/jld

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

EEVB/BJA/jle
Attachment

cc: E. A. Licitra (all w/a)
R. P. Zimmerman
A. C. Gehr
C. F. Tedford
M. C. Ley

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Jerry G. Haynes, represent that I am Vice President of Nuclear Production of Arizona Nuclear Power Project, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority to do so, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true and correct.

Jerry G. Haynes
Jerry G. Haynes

Sworn to before me this 19 day of November, 1985.

Nora E. Meador
Notary Public

My Commission Expires:

My Commission Expires April 6, 1987

Attachment

Description of Proposed Change

PVNGS has previously submitted to the NRC a request for an extension to the November 30, 1985 deadline of 10CFR 50.49 for the environmental qualification of the Hydrogen Recombiners. In order to complete the qualification effort for the Hydrogen Recombiners, the vendor must complete the remaining testing and certain equipment modifications must be made to the Hydrogen Recombiners which are currently installed at PVNGS. As part of the PVNGS effort to expediently implement the requirements of 10 CFR 50.49 for the Hydrogen Recombiners, ANPP requests a one-time change to the PVNGS Units 1 and 2 Technical Specifications. This change will exclude the provisions of Specification 3.0.4 from Specification 3.6.4.2 during the period of time that the environmental qualification modifications are being performed on the Hydrogen Recombiners. The one-time change will allow PVNGS to implement the requirements of 10 CFR 50.49 without impacting plant operations. Attached to this submittal is the amended page of the Technical Specifications for your review.

Safety Evaluation for the Proposed Change

This one-time change to the Technical Specifications will not increase the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR. The PVNGS Unit 1 Technical Specifications allow one Hydrogen Recombiner to be inoperable for 30 days. This change does not result in an increase to the out-of-service interval for the Hydrogen Recombiners. The change will allow PVNGS to ascend in operational modes with one Hydrogen Recombiner inoperable for the purpose of implementing the required modifications.

This one-time Technical Specification change will not result in the operation of the plant outside of its current design basis which assumes that one recombiner is inoperable for a limited period of time. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.

This proposed change will not reduce the margin of safety as defined in the basis for Technical Specification 3.6.4.2. The change will not increase the out-of-service interval for the Hydrogen Recombiners but will allow PVNGS Units 1 and 2 to ascend in modes with one Hydrogen Recombiner inoperable. Additionally, the proposed change will allow PVNGS to achieve compliance with the environmental qualification rule without impacting plant operations.

Significant Hazards Consideration Determination

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

(A) Operation of PVNGS Units 1 and 2 in accordance with this change would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or

2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or

3. Involve a significant reduction in a margin of safety, and

(B) The proposed change to the Technical Specifications will allow temporary relief from an operating restriction in order to implement the requirements of a regulation.

This one-time change to the PVNGS Unit 1 Technical Specifications does not constitute a Significant Hazards Consideration because the facility will still be operating within the design basis. This change does not authorize an increase to the out-of-service interval for the Hydrogen Recombiners. The change will ultimately result in a benefit to PVNGS and the public by allowing PVNGS to complete the environmental qualification of the Hydrogen Recombiners. This will provide further assurance that the Hydrogen Recombiners will be capable of fully performing their post-accident safety functions.

Proposed Compensatory Measures

There are no proposed compensatory measures associated with this one-time Technical Specification change.

Environmental Impact Consideration Determination

This proposed Technical Specification amendment does not result in a change of effluent types or total amounts and does not result in an increase in power level. Therefore, this change will not have any significant environmental impact.

ANPP 34043 1/19

CONTAINMENT SYSTEMS

ELECTRIC HYDROGEN RECOMBINERS

LIMITING CONDITION FOR OPERATION

3.6.4.2 Two portable independent containment hydrogen recombiner systems shared among the three units shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTION:

a. With one hydrogen recombiner system inoperable, restore the inoperable system to OPERABLE status within 30 days or meet the requirements of Specification 3.6.4.3, or be in at least HOT STANDBY within the next 6 hours.

b. The provisions of Specification 3.0.4 are not applicable during implementation of the environmental qualification modifications to the hydrogen recombiner system. #

SURVEILLANCE REQUIREMENTS

4.6.4.2 Each hydrogen recombiner system shall be demonstrated OPERABLE:

a. At least once per 6 months by:

1. Verifying through a visual examination that there is no evidence of abnormal conditions within the recombiner enclosure and control console.

2. Operating the air blast heat exchanger fan motor and enclosed blower motor continuously for at least 30 minutes.

b. At least once per year by:

1. Performing a CHANNEL CALIBRATION of recombiner instrumentation.

2. Performing a "Low-Level Test-Heater Power Off" and "Low-Level Test-Heater Power On" test and verifying that the recombiner temperature increases to and is maintained at 600 ± 25°F for at least one hour. With power off and a simulated input signal of 1280°F, verify the OPERABILITY of all control circuits. When this test is conducted, the air blast heat exchanger fan motor and enclosed blower motor shall be operated continuously for at least 30 minutes.

c. At least once per 5 years by performing a Recombiner System "High-Level Test" and verifying that the recombiner temperature increases to and is maintained at 1200 ± 50°F for at least one hour.

Action Statement (b) is effective until completion of the environmental qualification modifications to the hydrogen recombiner system or until March 31, 1986, whichever is earlier.