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AUTH. NAME AUTHOR AFFILIATION
HAYNES, J. G. Arizona Nuclear Power Project (formerly Arizona Public Serv
RECIP. NAME RECIPIENT AFFILIATION
KNIGHTON, G. W. PWR Project Directorate 7

SUBJECT: Application for amends to Licenses NPF-41 & NFP-51, deleting Tech Spec Sections 3/4.3.3 & 3/4.7 re fire protection requirements. Operation of fire protection program will be unchanged by deleting requirements from Tech Specs. Fee paid.

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Arizona Nuclear Power Project
P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

July 14, 1986
ANPP-37384-JGH/JKO/98.05

Director of Nuclear Reactor Regulation
Attention: Mr. G. 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 NPF-41)
STN 50-529 (License NPF-51)
Technical Specification Amendment - Fire Protection
File: 86-F-005-419.05; 86-E-056-026; 86-F-056-026

Dear Mr. Knighton:

Attached, please find proposed changes to Units 1 and 2 Technical Specifications Sections 3/4.3.3 and 3/4.7 concerning fire protection requirements.

We are requesting that the attached changes be incorporated into Units 1 and 2 Technical Specifications. Attachment 1, to this letter, is the no significant hazards consideration for your review and approval. Attachment 2 is the marked up copy of Unit 1 Technical Specifications with the changes and Attachment 3 is the changes for the Unit 2 Technical Specifications. Attachment 4 is the FSAR change to ensure the fire protection program is maintained as is. Attachments 5 and 6 are lists of the current procedures used to maintain the fire protection program, both administratively and testing requirements.

The basis for this change is that the fire protection program is covered by the operating license. The Technical Specifications are redundant. By deleting the fire protection requirements from the Technical Specifications, the entire fire protection program will fall under one governing document. The requirements of the license condition are sufficient to ensure that the fire protection program is maintained.

The operation of the fire protection program will not be changed by deleting the fire protection requirements from the Technical Specifications. Periodic testing and inspections will still be done and appropriate compensatory measures will still be initiated. Any significant changes to the fire protection program will be reviewed by a qualified fire protection engineer.

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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, please call.

Very truly yours,

JG Haynes

J. G. Haynes
Vice President
Nuclear Production

JGH/JKO/rw
Attachment

cc: A. C. Gehr
R. P. Zimmerman
E. A. Licitra
E. E. Van Brunt, Jr.

Attachment 1

Description of Amendment Request:

The proposed amendment would delete Technical Specifications 3/4.3.3.7; 3/4.7.11; 3/4.7.12; B 3/4.3.3.7; B 3/4.7.11; and B 3/4.7.12.

These Technical Specifications deal with the fire protection program. Due to the license condition of our operating licenses, (NPF-41 condition 2.C 7 and NPF-51 condition 2.C 6) having the fire protection requirements in the Technical Specifications is not necessary. The license condition adequately ensures that the fire protection will be maintained as is currently constituted.

Basis for No Significant Hazards Determination:

The proposed change does not involve a significant hazards consideration because operation of Palo Verde Unit 1 and Palo Verde Unit 2 in accordance with this change would not:

1. involve a significant increase in the probability or consequences of an accident. This change will not affect the functioning of the fire protection program. The program will be maintained pursuant to the facilities' operating licenses. No change will be made to the program that conflicts with the requirements of the license.

2. create the possibility of a new or different kind of accident from any previously analyzed. The fire protection program will still have adequate controls under the provisions of the license conditions. Eliminating the redundant and somewhat conflicting requirements of the Technical Specifications will not introduce the possibility for a new type of accident.

3. involve a significant reduction in a margin of safety. Since the program is to remain unchanged, the margin of safety will not be reduced. For any future change to the program, the stipulations of the license condition will be upheld.

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards consideration. Example (i) relates to a purely administrative change to Technical Specifications: for example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature. Example (vii) relates to a change to make a license conform to changes in the regulations where the license change results in very minor changes to the facility operations clearly in keeping with the regulations.

In this case, the proposed change is similar to both example (i) and example (vii) in that deletion of fire protection requirements from the Technical Specifications is an administrative change and is in keeping with the guidance of generic letter 86-10. The fire protection program is not changed, but will be controlled by the operating license and not by both the operating license and the Technical Specifications.

Presently some features of the program are allowed to be changed in accordance with the requirements of 10 CFR 50.59. Other minor changes cannot be handled that way merely because they exist in the Technical Specifications.

By having the fire protection requirements governed by the license only, the program will remain as it now stands, but allow changes quickly that would improve safety. As previously stated, periodic testing and inspection will still be completed; compensatory measures will still be established when appropriate, and no significant changes will be made without the review of a qualified fire protection engineer.