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 FACIL: STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528
 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
 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 to amend Licenses NPF-41 & NPF-51, revising Tech
 Specs to maintain fire protection reporting requirements as
 currently constituted. Fee paid.

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Arizona Nuclear Power Project

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

December 2, 1986
ANPP-39173-JGH/JKO/98.05

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
Units 1 and 2
Docket No. STN 50-528 (License NPF-41)
STN 50-529 (License NPF-51)
Technical Specification Amendment and Operating
License Amendment - Fire Protection
File: 86-F-005-419.05; 86-E-056-026; 86-F-056-026

Reference: (1) Letter dated July 14, 1986 (ANPP-37384) to
G. W. Knighton, NRC from J. G. Haynes, ANPP.
Subject: Technical Specification Amendment -
Fire Protection.

Dear Mr. Knighton:

Attached, please find proposed changes to Units 1 and 2 Technical Specifications and the Unit 1 operating license which have been requested by your staff.

We are requesting that the attached changes, along with those in the referenced letter, be incorporated into their respective documents. Attachment 1, to this letter, is the no significant hazards consideration for your review and approval. Attachment 2 is the marked up copy of Units 1 and 2 Technical Specifications with the changes. Attachment 3 is the change for Unit 1 operating license. Attachment 4 is the proposed FSAR change to ensure the fire protection program is maintained as is.

The basis for this change is that the fire protection program is governed by the FSAR and the operating license. The requirements of the license condition and the FSAR are sufficient to ensure that the fire protection program is maintained. Upon approval of the Technical Specification amendment request, ANPP will be able to make minor changes to the fire protection program without prior NRC approval.

The implementation of the fire protection program will not be changed by deleting the fire protection requirements from the Technical Specifications.

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1. The first part of the document is a letter from the President of the United States to the Congress, dated January 3, 1862. It contains a report on the state of the Union and the progress of the war.

2. The second part is a report from the Secretary of the Treasury, dated January 10, 1862. It contains a report on the state of the Treasury and the progress of the war.

3. The third part is a report from the Secretary of the Interior, dated January 17, 1862. It contains a report on the state of the Interior and the progress of the war.

4. The fourth part is a report from the Secretary of the Navy, dated January 24, 1862. It contains a report on the state of the Navy and the progress of the war.

5. The fifth part is a report from the Secretary of the War, dated January 31, 1862. It contains a report on the state of the War and the progress of the war.

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Mr. G. W. Knighton
Technical Specification Amendment - Fire Protection
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Page Two

Periodic testing will still be done and appropriate fire watches will still be initiated as necessary. Any significant changes to the fire protection program will be reviewed by a qualified fire protection engineer.

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,

A handwritten signature in dark ink, appearing to read "J. G. Haynes", with a long horizontal flourish extending to the right.

J. G. Haynes
Vice President
Nuclear Production

JGH/JKO/jle
Attachments

cc: O. M. De Michele
E. E. Van Brunt, Jr.



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ATTACHMENT 1

Description of Amendment Request

The proposed amendment would add Technical Specification 6.9.3 and revise Unit 1 operating license condition 2.C(7).

This Technical Specification addition enables ANPP to maintain the fire protection reporting requirements as currently constituted. The license condition of the Unit 1 operating license will be as stated in Generic Letter 86-10. The license condition and the FSAR adequately ensures that the fire protection program 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, and those stated in the FSAR. Reporting requirements are not being changed, but are being specifically described in the Technical Specifications.
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 specific fire protection 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 and the FSAR 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 governed by the operating license and the FSAR.

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 and the FSAR, the program will remain as it now stands, but allow changes to be made expeditiously 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. Technical Specification 6.9.3 will maintain the same reporting requirements. The fire protection program will still be audited under the requirements of the Technical Specifications.

THE
FEDERAL
BUREAU OF
INVESTIGATION
OF THE
DEPARTMENT OF JUSTICE
WASHINGTON, D. C. 20535