



## Arizona Nuclear Power Project

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

May 25, 1987  
161-00240-JGH/JRP

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Unit 1  
Docket No. STN 50-528 (License NPF-41)  
Technical Specification Changes  
File: 87-F-005-419.05; 87-056-026

Reference: Letter from J. G. Haynes (ANPP) to G. W. Knighton (NRC) dated  
July 23, 1986 (ANPP-37458).

Dear Sir:

Attached please find proposed changes to the PVNGS Unit 1 Technical Specifications covering various sections that are being amended to be consistent with Units 2 and 3. The changes presented herewith were previously discussed with and agreed to by your staff during the PVNGS Units 2 and 3 Technical Specification review process and have been incorporated into the PVNGS Units 2 and 3 operating license.

The proposed changes would revise the Unit 1 Technical Specifications to eliminate typographical errors, provide additional clarification, improve consistency, adjust nomenclature and bring the Technical Specifications in line with the guidance in recent Generic Letters.

Enclosed within this amendment request(s) are:

- A. Description of Amendment Request
- B. Purpose of the Technical Specification
- C. Need for the Specification Amendment
- D. Basis for No Significant Hazards Consideration
- E. Safety Analysis of the Proposed Change Request:
- F. Environmental Impact Consideration Determination
- G. Marked-Up Technical Specification Change Pages
- H. Categories of Changes

Enclosure 1 to this letter consists of an Index and brief description of the proposed changes. Enclosure 2 is the basis for the changes while Section H lists the categories of changes as they relate to 51 FR 7751.

8706030271 870525  
PDR ADDCK 05000528  
P PDR

Aoo!  
1/1



U.S. NRC Document Control Desk  
Technical Specification Changes  
161- 00240  
page 2

Attachment 1 is the basis for the deletion of the Pre-planned Alternate Sampling Program and Attachment 2 is the basis for changing the specific activity as per Generic Letter 85-19 guidance.

Pursuant to 10 CFR 50.91(1), and by copy of this letter and attachment, we have notified the Arizona Radiation Regulatory Agency of this request for a Technical Specification change.

In accordance with 10 CFR 170.12(c), the License Amendment application fee of \$150 was previously submitted with the reference letter. If you have any questions please call J. R. Provasoli at (602) 371-4160.

Very truly yours,



J. G. Haynes  
Vice President  
Nuclear Production

JGH/JRP/rw  
Attachments

cc: O. M. De Michele  
E. E. Van Brunt, Jr.  
G. W. Knighton (w/a)  
J. B. Martin "  
E. A. Licitra "  
R. P. Zimmerman "  
C. F. Tedford "  
A. C. Gehr

2000 年 12 月 25 日 星期一 晴 15℃

## ENCLOSURE 1

The following is a description of the proposed changes to the current Unit 1 Technical Specification.

1. Page I, INDEX; in Section 1.3 AZIMUTAL POWER TILT, add the term  $-T_q$ .
2. Page I, INDEX; in Section 1.17 OFFSITE DOSE CALCULATION MANUAL, add the term: (ODCM).
3. Page I, INDEX; in Section 1.23 PROCESS CONTROL PROGRAM, add the term: (PCP).
4. Page V, INDEX; in Section 3/4.2.2 PLANAR RADIAL PEAKING FACTORS, add the term:  $F_{xy}$ .
5. Page V, INDEX; in Section 3/4.2.3 AZIMUTHAL POWER TILT, add the term:  $-T_q$ .
6. Page VI, INDEX; in Section 3/4.4.8 REACTOR COOLANT SYSTEM, change 3/4 4-29 to 3/4 4-28.
7. Page VI, INDEX; in Section 3/4.4.8 PRESSURIZER HEATUP/COOLDOWN LIMITS, change 3/4 4-32 to 3/4 4-31.
8. Page VI, INDEX; in Section 3/4.4.8 OVERPRESSURE PROTECTION SYSTEMS, change 3/4 4-33 to 3/4 4-32.
9. Page VIII, INDEX; in Section 3/4.8.1 A.C. SOURCES, add CATHODIC PROTECTION 3/4 8-8a.
10. Page XI, 3/4.3.3 MONITORING INSTRUMENTATION, change B 3/4 3-2 to B 3/4 3-3.
11. Page XII, 3/4.4.6 CHEMISTRY, change B 3/4 4-4 to B 3/4 4-5.
12. Page XII, INDEX, Delete the heading CE-ATMOSPHERIC TYPE CONTAINMENT.
13. Page XVI, INDEX; in Section 6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP add (ISEG).
14. Page XVI, INDEX; in Section 6.5.1 PLANT REVIEW BOARD add (PRB).
15. Page XVI, INDEX in Section 6.5.2 TECHNICAL REVIEW AND CONTROL, add the word "ACTIVITIES".
16. Page XVII, INDEX, in Section 6.9.1 MONTHLY OPERATING REPORT, change 6-17 to 6-18.
17. Page XVII, INDEX; in Section 6.9.1 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATION REPORT, change 6-17 to 6-18.

18. Page XVII, INDEX; in Section 6.9.1 SEMI ANNUAL RADIOLOGICAL EFFLUENT RELEASE REPORT, change 6-18 to 6-19.
19. Page XVIII, INDEX; in Section 6.14 OFFSITE DOSE CALCULATION MANUAL, change 6-23 to 6-24.
20. Page XVIII, INDEX; delete Section 6.16 PRE-PLANNED ALTERNATE SAMPLING PROGRAM 6-25. (See separate write-up on the Pre-Planned Alternate Sampling Program, Attachment 1).
21. Page XIX, INDEX; List of Figures, Figure 3.4-1 change 3/4 4-28 to 3/4 4-27.
22. Page XIX, INDEX; List of Figures; Figure 3.4-2 change 3/4 4-30 to 3/4 4-29.
23. Page XX, INDEX; List of Tables, change 3.3-9 to 3.3-9A and delete the words DISCONNECT SWITCHES AND CONTROL CIRCUITS.
24. Page XX, INDEX; List of Tables, Add the following: 3.3-9B REMOTE SHUTDOWN DISCONNECT SWITCHES 3/4.3-50
25. Page XXI, INDEX; List of Tables, Add the following: 3.3-9C REMOTE SHUTDOWN CONTROL CIRCUITS 3/4 3-53.
26. Page XXI, INDEX; List of Tables, 4.3-7 change 3/4 3-59 to 3/4 3-60.
27. Page 1-5, definition 1.27; "specified in Section 50.73", change to read "specified in Section 50.72 and 50.73....."
28. Page 3/4 1-4, in specification 3.1.1.3; APPLICABILITY, place a period after 2\*#.
29. Page 3/4 1-8; Surveillance Requirements Section 4.1.2.2 should be 4.1.2.2.1.
30. Page 3/4 1-8; surveillance Requirements Section 4.1.2.3 should be 4.1.2.2.2.
31. Page 3/4 1-14, in specification 3.1.2.7; ACTION a.1, move the period to the right of the asterisk.
32. Page 3/4 1-21, in specification 3.1.3.1, ACTION c.2.a; figure 3.1-2A was inadvertently omitted from the Unit 1 Technical Specifications. Figure 3.1-2A represents the "Part Length CEA Insertion Limit vs Thermal power". The change is to include figure 3.1-2A to those figures listed, the ACTION STATEMENT should read, "----Figures 3.1-2A, 3.1-3 and 3.1-4"----.
33. Page 3/4 1-22, in specification 3.1.3.1, ACTION f, change Specification 4.1.3.2 to Specification 4.1.3.1.2,....
34. Page 3/4 1-25, in specification 3.1.3.2 ACTION C, move the period to the right of the asterisk.

35. Page B 3/4 1-2, in specification 3/4.1.2: delete the and between (3) and (4). Add an and after (4) and add (5) "the volume control tank (VCT) outlet valve CH-UV-501, capable of isolating the VCT from the changing pump suction line." This was added at the staffs request.
36. Page 3/4 2-2, IN SPECIFICATION 3.2.2 applicability, move the period to the right of the asterisk.
37. Page 3/4 2-3, in specification 3.2.3 APPLICABILITY, move the period to the right of the asterisk.
38. Page 3/4 2-9, in specification 3.2.6 APPLICABILITY, add a period after 2\*#.
39. Page 3/4 2-12, in specification 3.2.8 APPLICABILITY, move the period to the right of the asterisk.
40. Page 3/4 3-5, TABLE 3.3-1, ACTION STATEMENTS, ACTION 2 reference to Specification 6.5.1.6.h is incorrect, the proper Specification is 6.5.1.6.g.
41. Page 3/4 3-8, TABLE 3.3-1, ACTION STATEMENTS, ACTION 6.b.4 add figure 3.1-2B after Specification 3.1.3.1.
42. Page 3/4 3-8, TABLE 3.3-1, ACTION STATEMENTS, ACTION 6.C.1.C; the COLSS out of service Limit Line as specified in section 3.2.4 is shown on figure 3.2-2. Reference to figure 3.2-2 was inadvertently omitted from the Unit 1 Technical Specifications. Adding figure 3.2-2 clarifies the ACTION and is consistent with the LCO in section 3.2.4 for COLSS out of service. The change here is to add the following "on figure 3.2-2 of" between Limit Line and Specification 3.2.4.
43. Page 3/4 3-9, TABLE 3.3-1, ACTION STATEMENTS, ACTION 6.C.4. add the words "figure 3.1-2B" after specification 3.1.3.1.
44. Page 3/4 3-16, TABLE 4.3-1 TABLE NOTATIONS, item (8) the word "differential" was spelled incorrectly.
45. Page 3/4 3-16, TABLE 4.3-1 TABLE NOTATIONS, item (9). by adding the word "current" between the words correct and values, clarification is added. The table notation should now read in part "----the correct current values of"----.

Delete the words "per Specification 2.2.2" There is no specification 2.2.2 in the PVNGS Technical Specifications.

46. Page 3/4 3-22, TABLE 3.3-3 Item IX in the APPLICABLE MODES column delete the "#" sign after All Modes.
47. Page 3/4 3-23, TABLE 3.3.3 TABLE NOTATIONS; delete the # sign.
48. Page 3/4 3-23, TABLE, 3.3-3 ACTION STATEMENTS, ACTION 13. Specification "6.5.1.6h is incorrect, the correct Specification is "6.5.1.6.g".



49. Page 3/4 3-24, TABLE 3.3.3 ACTION STATEMENTS, ACTION 14. Last paragraph, change the reference from ACTION 14 to 13.
50. Page 3/4 3-29, TABLE 3.3-5 Item 7.b Auxiliary Feedwater (turbine drive), upper case T & D for Turbine Drive.
51. Page 3/4 3-36, TABLE 4.3-2 (continued) TABLE NOTATION (3). In Train A delete CIAS A and K205, in Train B delete CIAS B and K205. The reason for deleting these two actuation devices is that they are spare devices.
52. Page 3/4 3-38, TABLE 3.3-6 RADIATION MONITORING INSTRUMENTATION, footnote ###, delete the words "of Specification 6.16". This section has been deleted, refer to attachment 1 of the enclosures for justification.
53. Page 3/4 3-39, TABLE 3.3-6 (continued) ACTION 26, change the word recirculation to "essential filtration".
54. Page 3/4 3-39, TABLE 3.3-6 (continued) ACTION 28, Item (1); delete the words "of Specification 6.16". This section has been deleted, refer to attachment 1 of the enclosures for justification.
55. Page 3/4 3-48, Section 3.3.3.5, after the words TABLE 3.3-9 add A-C.
56. Page 3/4 3-48, Section 3.3.3.5 ACTION STATEMENT a., after the words TABLE 3.3-9 add A-C.
57. Page 3/4 3-49, TABLE 3.3-9 add A after TABLE 3.3-9 and delete the words DISCONNECT SWITCHES AND CONTROL CIRCUITS from the title.
58. Page 3/4 3-50, add the title heading; Table 3.3-9B REMOTE SHUTDOWN DISCONNECT SWITCHES.
59. Page 3/4 3-50 Disconnect Switches - Changes were made to correctly identify the switches and/or locations.
1. SG1 line 2 Atmospheric Dump Valve Solenoid Air Isolation Valves SGB-HY-178A and SGB-HY-178R.
  2. SG2 line 1 Atmospheric Dump Valve Solenoid Air Isolation Valves SGB-HY-185A and SGB-HY-185R.
  5. Reactor Coolant Pump Controlled Bleedoff, CHB-UV-505.
  8. Auxiliary Feedwater Pump B to SG1 Block Valve, AFB-UV-34.
  9. Auxiliary Feedwater Pump B to SG2 Block Valve, AFB-UV-35.
  16. SG1 line 2 Atmospheric Dump Valve Solenoid Air Isolation Valves SGD-HY-178B and SGD-HY-178S.
  17. SG2 line 1 Atmospheric Dump Valve Solenoid Air Isolation Valves SGD-HY-185B and SGD-HY-185S.
  18. Control BLDG Battery Room D  
Essential Exhaust Fan 'HJB-J01A'. PHB-M3205

- 19. Control BLDG Battery Room B  
Essential Exhaust Fan 'HJB-J01B'. PHB-M3205
- 20. Battery Charger D Control  
Room Circuits PKD-H14. PHB-M3209  
and PKD-H14
- 21. ESF Switchgear Room Essential AHU-HJB-Z03 PHB-M3205.
- 24. Essential Spray Pond Pump SPB-P01 Breaker Control.
- 60. Page 3/4 3-51, add the title heading: TABLE 3.3-9B (Continued) REMOTE  
SHUTDOWN DISCONNECT SWITCHES.
- 61. Page 3/4 3-51, Disconnect Switches - Changes were made to correctly  
identify the switches and/or locations.
- 25. Essential Chiller ECB-E01 Breaker Control.
- 26. E-PBB-S04J 4.16KV Feeder Breaker to 480V Load Center PGB-L32.
- 27. E-PBB-S04H 4.16KV Feeder Breaker to 480V Load Center PGB-L34.
- 28. E-PBB-S04N 4.16KV Feeder Breaker to 480V Load Center PGB-L36.
- 31. Supply Breaker to Load Center PGB L32.
- 32. Supply Breaker to Load Center PGB L34.
- 33. Supply Breaker to Load Center PGB L36.
- 35. Switch HS-2A.
- 36. Switch HS-2B.
- 37. Switch HS-2.
- 44. CS Pump B Discharge to SD HX B SIB-HV-689.
- 45. "Shutdown Cooling LPSI Suction SIB-UV-656.
- 48. LPSI-CS to SD HX B.
- 49. SD HX "B" to RC Loops.
- 62. Page 3/4 3-52, add the title heading: TABLE 3.3.9B (Continued) REMOTE  
SHUTDOWN DISCONNECT SWITCHES.
- 63. Page 3/4 3-52, Disconnect Switches - Changes were made to correctly  
identify the switches and/or location.

50. LPSI-SD HX "B" Bypass SIB-HV-307.
51. LPSI Pump "B" Recirc SIB-UV-668.
52. LPSI Pump "B" Suction from RWT SIB-HV-692.
53. SD Cooling LPSI Pump "B" Suction SIB-UV-652.
54. SD Cooling LPSI Pump "B" Suction SIB-UV-654.
55. LPSI Header "B" to RC Loop 2A SIB-UV-615.
56. LPSI Header "B" to RC Loop 2B SIB-UV-625.
57. VCT Outlet Isolation CHN-UV-501.
59. Shutdown Cooling Temperature Control SIB-UV-658.
67. RCS Sample Isolation Valve SSA-UV-203 SSA-J04.
68. RCS Sample Isolation Valve SSB-UV-200 RSP.
64. Page 3/4 3-53, add the title heading: TABLE 3.3-9C REMOTE SHUTDOWN CONTROL CIRCUITS.
65. Page 3/4 3-53 Control Circuits - Changes were made to correctly identify the circuits and/or location.
  1. Auxiliary Feedwater Pump B to S/G 1 Isolation Valve AFB-UV-34.
  2. Auxiliary Feedwater Pump B to S/G 1 Control Valve AFB-HV-30.
  3. Auxiliary Feedwater Pump B to S/G 2 Isolation Valve AFB-UV-35.
  4. Auxiliary Feedwater Pump B to S/G 2 Control Valve AFB-HV-31.
  7. Pressurizer Auxiliary Spray Valve CHB-HY-203.
  9. Letdown to Regen HX Isolation Valve CHB-UV-515.
  10. RCP Cont Bleedoff Valve CHB-UV-505.
  11. Volume Control Tank Outlet Isolation Valve CHN-UV-501.
  12. RWT Gravity Feed Isolation Valve CHE-HV-536.
  13. S/G 1 line 2 Atmospheric Dump Valve Controller SGB-HIC-178B.
  14. S/G 1 line 2 Atmospheric Dump Valve Solenoid Air Isolation Valves SGB-HY-178A and SGB-HY-178R.
  15. S/G 1 line 2 Atmospheric Dump Valve Solenoid Air Isolation Valves SGB-HY-178B and SGB-HY-178S.
  16. S/G 2 line 2 Atmospheric Dump Valve Controller SGB-HIC-185B.
  17. S/G 2 line 1 Atmospheric Dump Valve Solenoid Air Isolation Valves SGB-HY-185A and SGB-HY-185R.

18. S/G 2 line 1 Atmospheric Dump Valve Solenoid Air Isolation Valves SGB-HY-185B and SGB-HY-185S.
22. E-PBB-SO4H 4.16KV Feeder Breaker to 480V Load Center PGB-L-34 Supply Breaker.
23. E-PBB-SO4J 4.16KV Feeder Breaker to 480V Load Center PGB-L-32 Supply Breaker.
24. E-PBB-SO4N 4.16KV Feeder Breaker to 480V Load Center PGB-L-36 Supply Breaker.
25. E-PGB-L32B2 480V Main Supply Breaker to Load Center PGB-L-32. PGB-L32B1
26. E-PGB-L34B2 480V Main Supply Breaker to Load Center PGB-L-34. PGB-L34B1
66. Page 3/4 3-54, add the title heading: TABLE 3.3-9C (Continued) REMOTE SHUTDOWN CONTROL CIRCUITS.
67. Page 3/4 3-54 Control Circuits - changes were made to correctly identify the circuits and/or locations.
27. E-PGB-L36 480V Supply Breaker to Load Center PGB-L-36. PGB-L36B1
31. Essential Spray Pond Pump SPB-PO1.
39. SIT 2A Vent Valve - SIB-HV-613.
40. SIT 2B Vent Valve - SIB-HV-623.
41. SIT 1A Vent Valve - SIB-HV-633.
42. SIT 1B Vent Valve - SIB-HY-643.
44. Containment Spray Pump B Discharger to SD HX "B" Valve SIB-HV-689.
45. LPSI Containment Spray from SD HX "B" X-tie Valve SIB-HV-695.
46. Shutdown Cooling LPSI Suction Valve SIB-HV-656.
47. Shutdown Cooling Warmup Bypass Valve SIB-HV-690.
48. LPSI Containment Spray to SD HX "B" X-tie Valve SIB-HV-694.
68. Page 3/4 3-55, add the title heading: TABLE 3.3-9C (Continued) REMOTE SHUTDOWN CONTROL CIRCUITS.
69. Page 3/4 3-55, Control Circuits - changes were made to correctly identify the circuits and/or locations.
49. SD HX "B" to RC Loops 2A/2B Valve SIB-HV-696.



50. LPSI SD HX "B" Bypass Valve SIB-HV-307.
51. LPSI Pump B Recirc Valve SIB-HV-688.
52. LPSI Pump B Suction From RWT SIB-HV-692.
53. RC Loop to Shutdown Cooling Valve SIB-UV-652.
54. RC Loop to Shutdown Cooling Valve SIB-UV-654.
55. LPSI Header B to RC Loop 2A Valve SIB-UV-615.
56. LPSI Header B to RC Loop 2B Valve SIB-UV-625.
58. Control Room Ventilation Isolation Dampers                      RSP  
HJB-M01/HJB-M55
59. O.S.A. Supply Damper HJB-M02                                      RSP
60. O.S.A. Supply Damper HJB-M03                                      RSP
61. Diesel Generator "B" Emergency Start                              DGB-B01
66. RCS Sample Isolation Valve SSA-UV-203                              SSA-J04
67. RCS Sample Isolation Valve SSB-UV-200                              SSB-J04
70. Page 3/4 3-58, TABLE 3.3-10; the table heading should read POST ACCIDENT MONITORING INSTRUMENTATION.
71. Page 3/4 3-59, this page should be renumbered to 3/4 3-60.
72. Page 3/4 3-60 TABLE 4.3-7 should be TABLE 3.3-10, and the page should be re-numbered to 3/4 5-59.
73. Page 3/4 3-73, TABLE 3.3-13 (Continued) Item 3.A.a, b, c, d & e; add a triple asterisk to the APPLICABILITY column for modes 3\*\*\*, 4\*\*\*. The triple asterisk states "Whenever the condenser air removal system is in operation, or whenever turbine glands are being supplied with steam from sources other than the auxiliary boiler(s)". This statement clarifies that the referenced monitors need be operable during modes 1 and 2 and whenever the condenser air removal systems is in operation or whenever turbine glands are being supplied with steam from sources other than the auxiliary boiler(s), all other times the monitors need not be operable.
74. Page 3/4 3-73, TABLE 3.3-13, (Continued) Item 3.B.a, b, c, d; add a triple asterisk to the APPLICABILITY column for modes 3\*\*\*, 4\*\*\*. The triple asterisk states "Whenever the condenser air removal system is in operation, or whenever turbine glands are being supplied with steam from sources other than the auxiliary boiler(s)". (The justification for this changes is in item number 73).

75. Page 3/4 3-75, TABLE 3.3-13, TABLE NOTATION, add a triple asterisk (\*\*\*) and the words "Whenever the condenser air removal system is in operation, or whenever turbine glands are being supplied with steam from sources other than the auxiliary boiler(s)". (The justification for this change is in item number 73).
76. Page 3/4 3-75, TABLE 3.3-13, ACTION 37, (A) or (B) is to be changed to (a) or (b) or (c). This change only expands items a and b into (c) which already states "Take grab samples at least once per 12 hours."
- Delete the words "of Specification 6.16" in ACTION 37a, refer to attachment 1 of the enclosures for justification.
77. Page 3/4 3-76, in TABLE 3.3-13, TABLE NOTATION, ACTION 42 a., delete the words "of Specification 6.16", refer to attachment 1 of the enclosures for justification.
78. Page 3/4 3-78, TABLE 4.3-8 (Continued) ITEM 3.a, b, c, d, e; add a triple asterisk to "MODE IN WHICH SURVEILLANCE IS REQUIRED" column modes 3\*\*\*, 4\*\*\*. The triple asterisk states "Whenever the condenser air removal system is in operation, or whenever turbine glands are being supplied with steam from sources other than the auxiliary boiler(s)". This statement clarifies that the referenced monitors need be operable during modes 1 and 2 and whenever the condenser air removal system is in operation or whenever turbine glands are being supplied with steam from sources other than the auxiliary boiler(s), all other times the monitors need not be operable.
79. Page 3/4 3-80, TABLE 4.3-8, TABLE NOTATIONS; add a \*\*\* triple asterisk with the statement; Whenever the condenser air removal system is in operation, or whenever turbine glands are being supplied with steam from sources other than the auxiliary boiler(s). (The justification for this change is in item number 78).
80. Page B3/4 3-1, delete paragraphs 5 and 6 from the Bases and add the following to Technical Specification Section 6.8.1 Note(2) page 6-13. (2) Modifications to the CPC software (including algorithm changes and changes in fuel cycle specific data) shall be performed in accordance with the most recent version of CEN-39(A)-P, "CPC Protection Algorithm Software Change Procedure," that has been determined to be applicable to the facility. Additions or deletions to CPC Addressable Constants or changes to Addressable Constant software limit values shall not be implemented without prior NRC approval. This change was requested by the NRC staff. (Item 207 of the index)
81. Page B3/4 3-2, delete the third paragraph, this sentence was inadvertently added to the bases from information contained in a letter from the NSSS vendor.
82. Page B3/4 3-3, Section 3/4.3.3.3 SEISMIC INSTRUMENTATION, add the following sentence to the end of the paragraph. The seismic instrumentation for the site is located in TABLE 3.3-7.

83. Page B3/4 3-5, delete the term FIRE DETECTION INSTRUMENTATION and replace it with the term POST-ACCIDENT MONITORING INSTRUMENTATION.
84. Page 3/4 4-1, in specification 3.4.1.1 APPLICABILITY, move the period to the right of the asterisk.
85. Page 3/4 4-2, in specification 3.4.1.2 move the period to the right of the asterisk.
86. Page 3/4 4-2, in specification 3.4.1.2 APPLICABILITY, move the period to the right of the # sign.
87. Page 3/4 4-2, in specification 4.4.1.2.3, after the word OPERABLE add the word "by".
88. Page 3/4 4-3, IN SPECIFICATION 3.4.1.3, move the period to the right of the asterisk.
89. Page 3/4 4-3, in specification 3.4.1.3 a., move the comma to the right of the double asterisk.
90. Page 3/4 4-3, in specification 3.4.1.3 b., move the comma to the right of the double asterisk.
91. Page 3/4 4-3, in specification 3.4.1.3 APPLICABILITY, move the period to the right of the # sign.
92. Page 3/4 4-5, in the footnotes move the asterisk footnote ahead of the # footnote.
93. Page 3/4 4-6, in specification 3.4.1.4.2, move the period to the right of the asterisk.
94. Page 3/4 4-7, in specification 3.4.2.1, move the period to the right of the asterisk.
95. Page 3/4 4-8, in specification 3.4.2.2, move the period to the right of the asterisk.
96. Page 3/4 4-10, in specification 4.4.3.2.2, this section should be changed to 4.4.3.2.3 and section 4.4.3.2.2 should now read "CH-HV-524 and CH-HV-532 shall be verified locked open at lease once per 31 days. (The staff requested that this be added)."
97. Page 3/4 4-16, TABLE 4.4-1 portions of this table were added by the NRC staff for clarification.
98. Page 3/4 4-19, in specification 3.4.5.2 APPLICABILITY, add a period after 4.
99. Page 3/4 4-20, in specification 4.4.5.2.1 c., add a double asterisk after 72 hours \*\* and move the period to the right of the double asterisk.
100. Page 3/4 4-20, in specification 4.4.5.2.2, add a double asterisk after limit \*\* and move the colon to the right of the double asterisk.

101. Page 3/4 4-20, place a double asterisk in front of the sentence "\*\*\* The provisions of Specification 4.0.4 are not applicable for entry into MODE 3 or 4." Move the sentence to the bottom of the page below the existing footnote. The double asterisk was inadvertently omitted during the typing of Unit 1 and moving the sentence down is an editorial move.
102. Page 3/4 4-23, TABLE 3.4-2, move the word CHEMISTRY to be in line with the title.
103. Page 3/4 4-25, specification 3.4.7, ACTION a, b and c (see justification in attachment 2 of the enclosures).
104. Page 3/4 4-26, specification 4.4.7 SURVEILLANCE REQUIREMENTS, move this section to page 4-25. Due to Generic Letter 85-19 this section has been re-written and the surveillance requirements moved from page 4-26 to 4-25.
105. Page 3/4 4-27, TABLE 4.4-4, change this page to 3/4 4-26.
106. Page 3/4 4-28, FIGURE 3.4-1, this page should be renumbered to 3/4 4-27.
107. Page 3/4 4-29, in specification 3.4.8.1, APPLICABILITY, move the period to the right of the asterisk.
108. Page 3/4 4-29, this page should be renumbered to 3/4 4-28.
109. Page 3/4 4-30, Figure 3.4.2, change the term isothermal to 10°/HR Heatup., and add item (10) 255 °F, 2500 PSIA. This change is made in conjunction with the change to specification 3/4.4.8.3. Re-examination of the pressure/temperature analysis shows that the isothermal to 100°F/HR cooldown curve (figure 3.4-2) also encompasses the 10°F/HR heat up rate.
110. Page 3/4 4-30. this page should be renumbered to 3/4 4-29.
111. Page 3/4 4-31, TABLE 4.4-5, add to each Lead Factor listed in the table the following; "1.0<LF<1.5". This is added as further clarification, presently it reads 1.5; by adding 1.0<LF<1.5, the upper and lower limits are given.
112. Page 3/4 4-31, this page should be renumbered to 3/4 4-30.
113. Page 3/4 4-32, this page should be renumbered to 3/4 4-31.
114. page 3/4 4-33, this page should be renumbered to 3/4 4-32.
115. Page 3/4 4-35, in specification 3.4.10 the Limiting Condition for Operation should now read; "Both reactor coolant system vent paths shall be operable and closed at each of the following locations:
  - a. Reactor vessel head, and
  - b. Pressurizer steam space.

This change is for clarification purposes only, it identifies both of the reactor coolant system vent paths which were previously not identified.

116. Page 3/4 4-35, in specification 3.4.10, APPLICABILITY, add a period after 4.
117. Page 3/4 4-35, in specification 3.4.10, ACTION a., delete the term "vessel head" and replace it with the term "coolant system". After the word OPERABLE add the words "from either location" and after the words "both paths" add the following "at that location."
118. Page 3/4 4-35, ACTION b. delete the term "vessel head" and replace it with the term "coolant system." After the word OPERABLE add the words "from either location" and after the words "both paths: add the following "at that location."
119. Page B 3/4 4-5, in specification 3/4.4.7, second paragraph, second sentence, delete the rest of the paragraph. Section 6.9.1.5 includes the latest information from Generic Letters. (see attachment 2).
120. Page B3/4 4-6, add a comma after the word rupture in the second line.
121. Page B3/4 4-7, item (1) after the word reference, add the word temperature.
122. Page B3/4 4-7, last sentence on the page. The word specimens appears twice, it should be changed to "capsules" in both places. TABLE 4.4-3 should be changed to TABLE 4.4-5.
123. Page<sub>2</sub> B3/4 4-10, FIGURE B3/4.4-1; after the term NEUTRON FLUENCE, add n/cm. A5338 should be changed to A533B.
124. Page B 3/4 4-11, Pressure/Temperature Limits (continued), third paragraph, delete the second sentence "Figure B 3/4.4-2, provides the limits of Appendix G to 10CFR Part 50 for various heatup and cooldown rates. There is no Figure B 3/4.4-2.
125. Page 3/4 5-1, in specification 3.5.1 (e), move the period to the right of the double asterisk.
126. Page 3/4 5-5, in specification 4.5.2.e, add a (4) "Conducting an inspection of all ECCS piping outside of containment, which is in contact with recirculation sump inventory during LOCA conditions, and verifying that the total measured leakage from piping and components is less than 1 gpm when pressurized to at least 40 psig. (this is included at the staffs request).
127. Page 3/4 5-6, in specification 3.5.1.g.2, under Hot Leg Injection Valve Number, delete values SIA-HV 604 and SIB-HV 609. These values were inadvertently included in the list for throttle values. Valves SIA-HV 604 and SIB-HV 609 are not throttle valves and should be deleted from this list.
128. Page B3/4 5-3, first line, move the period to the right of the asterisk.

129. Page 3/4 6-3, in specification 4.6.1.2.e; change the referenced specifications from 4.6.1.7.4 to 4.6.1.7.3; and 4.6.1.7.3 to 4.6.1.7.2. This surveillance requirement concerns isolation valves with resilient material seals, (specification 4.6.1.7.4) concerns isolation valves but not with resilient material seals.
130. Page 3/4 6-5, in specification 4.6.1.3.b.2, move the period to the right of the asterisk.
131. Page 3/4 6-7, in specification 4.6.1.5 add to each elevation listed the word "Nominal" so it should read "Nominal Elevation 0'-0". This is a clarifying statement in that the exact elevation may vary (+ or-).
132. Page 3/4 6-15, in specification 3.6.2.1 APPLICABILITY, move the period to the right of the asterisk.
133. Page 3/4 6-17, in specification 3.6.2.2.a the word An should be "A".
134. Page 3/4 6-17, in specification 3.6.2.2 APPLICABILITY, after 4 and before the period place an asterisk. The asterisk footnote should read \* When the containment spray system is required to be OPERABLE.
135. Page 3/4 6-19, in specification 3.6.3. ACTION 1.b., move the comma to the right of the asterisk.
136. Page 3/4 6-19, in specification 3.6.3.c ACTION 1.c., move the semi-colon to the right of the asterisk.
137. Page 3/4 6-22 TABLE 3.6-1. The following changes were made to correctly identify the function.
  - Valve Number SSB-UV-201, Pressurizer liquid sample line.
  - Valve Number SSA-UV-204, Pressurizer liquid sample line.
  - Valve Number SSB-UV-202, Pressurizer steam space sample line.
  - Valve Number SSA-UV-205, Pressurizer steam space sample line.
  - Valve Number SSB-UV-200, Hot leg sample line.
  - Valve Number SSA-UV-203, Hot leg sample line.
138. Page 3/4 6-30 Table, change the footnote to reference the correct section; 3/4.7.1.5.
139. Page 3/4 6-35, TABLE 3.6-1, delete the asterisk for Valve Number FPE-V-089.
140. Page 3/4 6-35, TABLE 3.6-1, the function for Valve Number SIE-V-463 is safety injection tank drain.
141. Page 3/4 6-35, TABLE 3.6-1, add the following footnote to the bottom of the page # Not Type C Tested.

142. Page 3/4 6-36, in specification 3.6.4.1 ACTION C, delete this action statement. The action statement as it reads is incorrect, there is no in-line hydrogen monitor in the Post Accident Sampling System.
143. Page 3/4 6-38, in specification 3.6.4.3 APPLICABILITY, move the period to the right of the asterisk.
144. Page B 3/4 6-2, in specification 3/4.6.1.6, change Revision 3, 1984; to Revision 1, 1974. Delete the rest of the sentence starting with "and Regulatory Guide 1.35.1"... In FSAR we are committed to revision 1 of RG 1.35 and RG 1.35.1 was never issued (Draft only).
145. Page B 3/4 6-4, in Bases section 3/4.6.4, delete the second paragraph. This paragraph starts off by saying "There is a hydrogen monitor and a oxygen monitor in the Post Accident Sampling System." This sentence and paragraph is incorrect, there is no hydrogen monitor or oxygen monitor in the Post Accident Sampling System.
146. Page 3/4 7-1, in specification 3.7.1.1 ACTION a., change the action to read in part --- "operation in MODES 1 and 2 may proceed"---, (Delete 3). Change the words --- "Power Level-High trip setpoint is"--- to ---"Maximum Variable Overpower trip setpoint and the Maximum Allowable Steady State Power Level are reduced per Table 3.7-2,". The reason for deleting mode 3 is that it is already covered in action b of this section. The change to the words is for clarification, and to be correct.
147. Page 3/4 7-1, in specification 3.7.1.1.b, in the first line add the words "at least" between with one.
148. Page 3/4 7-6, in specification 3.7.1.3 APPLICABILITY, move the comma after 3 to the right of the pound sign and move the period to the right of the asterisk, pound sign.
149. Page 3/4 7-6, ACTION b. the term auxiliary feedwater should be changed to essential auxiliary feedwater.
150. Page 3/4 7-6, in specification 4.7.1.3.2, in the term auxiliary feedwater should be changed to essential auxiliary feedwater.
151. Page 3/4 7-6, in specification 4.7.1.3.2.a, the term auxiliary feed system should be changed to auxiliary feedwater system.
152. Page 3/4 7-10, in specification 3.7.1.6, move the period to the right of the asterisk.
153. Page 3/4 7-16, in specification 3.7.7 ACTION b., delete the words "in the recirculation mode" and replace it with the term "OPERABLE".
154. Page 3/4 7-21, Section 4.7.9a; change the term Inspection Types to Snubber Types.
155. Page 3/4 7-22, Section 4.7.9c; in the middle of the paragraph susceptible was spelled incorrectly.

156. Page 3/4 7-22, Section 4.7.9c; delete the sentence "All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers." There are no common hydraulic fluid reservoirs.
157. Page 3/4 7-22, Section 4.7.9d; after the word "data" place a period, delete the word "and " and start a new sentence, "A visual inspection" --- add the term "shall be made" between the words "systems" and "within 6 months".
158. Page 3/4 8-8a, A.C. Sources; add the title "CATHODIC PROTECTION" to the heading.
159. Page 3/4 8-8a, in specification 4.3.1.3, item 1. Change the 92 days to 61 days.
160. Page 3/4 8-8a, in specification 4.3.1.3, item 2. Change the 18 months to 12 months. This change is based on the guidance provided in Regulatory Guide 1.137 which states "at intervals not exceeding 12 months; test should be conducted on each underground cathodic protection system---".
161. Page 3/4 8-14, in specification 3.8.3.1.c, move the period to the right of the asterisk.
162. Page 3/4 8-14, in specification 3.8.3.1.d, move the period to the right of the asterisk.
163. Page 3/4 8-14, in specification 3.8.3.1.e, move the period to the right of the asterisk.
164. Page 3/4 8-14, in specification 3.8.3.1.f, move the period to the right of the asterisk.
165. Page 3/4 8-22, TABLE 3.8-2; Containment Penetration Conductor, the following Overcurrent Protective Devices have been corrected:

REACTOR COOLANT PUMP OIL LIFT PUMP  
1BM-RCN-P02BP

REACTOR COOLANT PUMP OIL LIFT PUMP  
2BM-RCN-P02DP

30A RECEPTACLES FOR CTMT BLDG.  
JIB CRANE M-ZCN-GO4A,B

30A RECEPTACLES FOR CTMT BLDG.  
JIB CRANE M-ZCN-GO4A,B

166. Page 3/4 8-24, TABLE 3.8-2 (continued) Containment Penetration Conductor, Overcurrent Protective Devices Primary Device Number. Delete the two devices from this page and add them to the pages which list the fuse(s), also the primary device number and backup device change, however, the service description remains the same. These devices are added in this index at item number 176.

E-PHA-M3519	E-PHA-M3521A	CTMT PRG PWR ACCESS MODE
		ISO VLV J-CPA-UV-4B
E-PHB-M3624	E-PHA-M3607A	CTMT PRG PWR ACCESS MODE
		ISO VLV J-CPB-UV-4A

167. Page 3/4 8-25 TABLE 3.8-2, Containment Penetration Conductor, the following overcurrent protective device has been corrected:

WASTE GAS HEADER CONTAINMENT  
ISOLATION VALVE J-GRA UV1

168. Page 3/4 8-26, TABLE 3.8-2 Containment Penetration Conductor. The following list contains corrected primary device numbers:

E-RCN-D0102  
E-RCN-D0101  
E-RCN-D0301  
E-RCN-D0302  
E-RCN-D0201  
E-RCN-D0202  
E-RCN-D0401  
E-RCN-D0402

169. Page 3/4 8-27, TABLE 3.8-2 Containment Penetration Conductor. The following list contains corrected primary device numbers:

E-NAN-S02M	
J-RCN-PC100A	E-NGN-L11C4
(Fuse)	
J-RCN-PC100B	E-NGN-L12C4
(Fuse)	

170. Page 3/4 8-33, TABLE 3.8-2 Containment Penetration Conductor. The following list contains corrected service descriptions:

Reactor Coolant Pump Motor Space Heater M-RCE-P01BH  
Reactor Coolant Pump Motor Space Heater M-RCE-P01DH  
Containment Pre access Normal AFU Fan Motor  
Space Heater M-HCN-F01BH  
Reactor Coolant Pump Motor Space Heater M-RCE-P01AH  
Reactor Coolant Pump Motor Space Heater M-RCE-P01CH  
Steam Generator Wet Layup Pump Motor Space Heater M-SGN-P01BH

171. Page 3/4 8-34, TABLE 3.8-2. The following is the corrected service description for overcurrent protective devices.

Containment Normal ACU Fan Motor Space Heater M-HCN-A01DH

172. Page 3/4 8-35, TABLE 3.8-2. The following overcurrent protective devices are being added to one section of the table and are being deleted from another section of the table.

E-ZAB-C06 (Fuse)	E-PKB-D2221	Reactor Coolant Vent Valve J-RCB-HV-105
E-ZAB-C06 (Fuse)	E-PKB-D2221	Safety Inj. Tank Nitrogen Supply Valve J-SIB-UV-612

173. Page 3/4 8-36, TABLE 3.8-2. The following overcurrent protective devices are being added to one section of the table and are being deleted from another section of the table.

E-ZAA-C03 (Fuse)	E-PAK-D2109	Reactor Coolant Vent Valve J-RCA-HV-101
E-ZJB-C03 (Fuse)	E-PKB-D2211	SI Tank check Vlv Leakage Line ISO Valve J-SIB-UV-638
E-ZJB-C03 (Fuse)	E-PKB-D2211	Hot Leg Inject Check Vlv Leakage Line ISO Valve J-SIB-UV-332
E-ZAA-C04 (Fuse)	E-PAK-D2130	Containment Purge Power Access Mode Isolation Vlv. J-CPA-UV-4A
E-ZAA-C04 (Fuse)	E-PAK-D2130	Containment Purge Power Access Mode Isolation Vlv. J-CPA-UV-4B
E-ZAA-C03 (Fuse)	E-PAK-D2109	Regenerative Heat Exch to AUX Spray Valve J-CHA-HV-205

174. Page 3/4 8-37, TABLE 3.8-2. The following overcurrent protective devices are being added to one section of the table and are being deleted from another section of the table.

E-ZAB-C01 (Fuse)	E-PKB-D2210	Containment Power Access Purge Mode Isolation Vlv. J-CPB-UV-5A
E-ZAB-C01 (Fuse)	E-PKB-D2210	Containment Power Access Purge Mode Isolation Vlv. J-CPB-UV-5B

175. Page 3/4 8-38, TABLE 3.8-2 (continued) Containment Penetration Conductor Overcurrent Protective Devices. The following overcurrent protective devices are being deleted from this page, they have been added to previous pages (8-35 & 8-36). The reason for the change is to keep the primary device and the backup device numbers in sequence.

E-ZAB-C06 (Fuse)	E-PKB-D2221	Reactor Coolant Vent Valve J-RCB-HV-105
E-ZAB-C06 (fuse)	E-PKB-D2221	Safety Inj Tank Nitrogen Supply Valve J-SIB-UV-612

E-ZAB-C03 (fuse)	E-PKB-D2221	SI Tank Vlv Leakage Line
E-ZJB-C03 (fuse)	E-PKB-D2211	Iso Valve J-SIB-UV-638
		Hot Leg Impact Check Vlv Leakage
		Iso Valve J-SIB-UVB-332

176. Page 3/4 8-41, TABLE 3.8-3 Motor-Operated Valves Thermal Overload, Protection and/or Bypass Devices. Under the Bypass Device Column delete the term "(continuous)".
177. Page 3/4 8-42, TABLE 3.8-3, delete the term "(continuous)".
178. Page 3/4 8-43, TABLE 3.8-3, delete the term "(continuous)".
179. Page 3/4 8-44, TABLE 3.8-3, delete the term "(continuous)".
180. Page 3/4 8-45, TABLE 3.8-3, delete the term "(continuous)".
181. Page 3/4 8-46, TABLE 3.8-3, delete the term "(continuous)".
182. Page 3/4 8-47, TABLE 3.8-3, delete the term "(continuous)".
183. Page 3/4 8-48, TABLE 3.8-3, delete this page. The reason for deleting this page is that the devices are listed on the previous page, this page duplicates the devices.
184. Page B3/4 8-2, A.C. SOURCES D.C. SOURCES AND ONSITE POWER DISTRIBUTION SYSTEM Second Paragraph, the term onfloat should be two words "on float".
185. Page 3/4 9-2, in specification 3/4.9.2 LIMITING CONDITION FOR OPERATION 3.9.2, change the term "source range" to "startup channel".
186. Page 3/4 9-2, SURVEILLANCE REQUIREMENTS 4.9.2, change the term "source range" to "startup channel".
187. Page 3/4 9-8, in specification 3.9.8.1, move the period to the right of the asterisk.
188. Page 3/4 9-9, in specifications 3.9.8.2, move the period to the right of the asterisk.
189. Page 3/4 9-13, in specification 3.9.11, ACTION STATEMENT, add the words "The provisions of Specification 3.0.3 are not applicable. This change brings the technical specification in agreement with NUREG-0212 REV. 2. Specification 3.1.2.1 and 3.1.2.2 adequately provide actions to be taken to supply water for boration flow paths. The exclusion statement to 3.0.3 was inadvertently omitted during the review process.
190. Page B3/4 9-1, in Section 3/4.9.2 INSTRUMENTATION, change the term "source range" to startup channel.
191. Page 3/4 10-2, in specification 4.10.2.2, the reference to specification 4.2.1.3 is incorrect, the correct reference is 4.2.1.2. Specification 4.10.2.2 specifies that the linear heat rate be determined to be within the

limits of 3.2.1 by monitoring it continuously with the Incore Detector Monitoring System pursuant to the requirements of specification 4.2.1.2 (not 4.2.1.3). Specification 4.2.1.3 is the surveillance requirements to verify the COLSS Margin Alarm is actuated at a thermal power level.

192. Page 3/4 11-9, TABLE 4.11-2, last paragraph, move the period to the right of the asterisk.
193. Page 3/4 12-4, TABLE 3.12-1, Ingestion Milk, delete the numbers 50, 51, 53 inside of parentheses after the words "in 3 locations," add the parentheses and number (#50, 51, 53) after the words "in each of 3 areas". At Palo Verde there are no milking animals within 5 km distances, therefore the deletion, there are milking animals between 5 and 8 km, therefore the addition.
194. Page 3/4 12-5, TABLE 3.12-1, delete number 14 and 46 and add number 52 to the first sentence. In the second paragraph delete number 51 and add number 62. Sample location 14 and 46 no longer exist however there is a new sample location number 52. Sample location 51 no longer exists and is being replaced with sample location number 62. The reason for the sample location changes is that some of the families moved out of the area and there are no other broad leaf vegetation gardens.
195. Page 3/4 12-10, TABLE 4.12-1, the term wt should be corrected to  $\Delta t$ .
196. Page 6-2, in specification 6.2.2.2.c, change the second line from "designee who is at supervisory" to "designees who are at manager"...
197. Page 6-5, TABLE 6.2-1, first paragraph, delete the term "Except for the Shift Supervisor", and start the sentence with "The". Page 6-5, TABLE 6.2-1, second paragraph, delete the term "(other than the Shift Technical Advisor)".
198. Page 6-8, in specification 6.5.1.6.d., delete the term "requiring 24-hour written notification to the commission".  
In specification 6.5.1.6.g, change the word "or" to "of".
199. Page 6-9, in specification 6.5.2 TECHNICAL REVIEW AND CONTROL, add the word ACTIVITIES.
200. Page 6-9, in specification 6.5.2.6, after PVNGS Plant Manager add "or designated alternate."
201. Page 6-9, in specification 6.5.2.7, after PVNGS Plant Manager add "or designated alternate."
202. Page 6-10, in specification 6.5.2.9 TECHNICAL REVIEW AND CONTROL, add the word ACTIVITIES before (Continued).
203. Page 6-12, in specification 6.5.3.5, delete item 1. "The Pre-planned Alternate Sampling Program and implementing procedures at least once per 24 months". This section is to be deleted, refer to attachment 1 of the enclosures for justification.

204. Page 6-12, in specification 6.6.1.a., after the word "notified" add the following statement, "pursuant to the requirements of Section 50.72 to 10CFR Part 50"-----.
205. Page 6-12, in specification 6.6.1.b., delete the following "requiring 24 hours written notification".
206. Page 6-13, in specification 6.7.1.c, change the reporting requirement from 14 days to 30 days. This change is in agreement with the requirements as specified in 10 CFR 50.73 (a) which states 30 days.
207. Page 6-13, in specification 6.8.1 (g), NOTE: add an (s) to NOTE; add a (1) before the word Modification. Add a (2) with the following statement. "Modifications to the CPC software (including algorithm changes and changes in fuel cycle specific data) shall be performed in accordance with the most recent version of CEN-39 (A)-P, "CPC Protection Algorithm Software Change Procedure", that has been determined to be applicable to the facility. Additions or deletions to CPC Addressable Constants or changes to Addressable Constant software limit values shall not be implemented without prior NRC approval.
208. Page 6-16, in specification 6.8.4.f SPRAY POND MONITORING; delete the words "Procedure 73AC-SP01 and add the words "station manual procedures." This change is editorial, by deleting the procedure number any changes to the procedure number will not necessitate a technical specification change.
209. Page 6-17, in specification 6.9.1.5, add the following paragraph "Annual reports shall also include the results of specific activity analysis in which the primary coolant exceeds the limits of Specification 3.4.7. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should included date and time of sampling and the radioiodine concentration; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcures per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit. (see attachment 2)
210. Page 6-19, in Specification 6.9.1.8, move the period to the right of the asterisk.
211. Page 6-25, in specification 6.16; delete this section, 6.16, 6.16.1 and 6.16.2, refer to attachment 1 of the enclosures for justification.
212. Page B 3/4 8-1, Bases 3/4.8; by application for amendment dated 5-14-86 and by corrected copy dated 5-14-86 (ANPP 36587) requested that the A.C. Sources specification be changed. This request was approved and issued by the NRC in Amendment No. 9 to NPF-41 dated 9-3-86. However, Bases page B 3/4 8-1 was inadvertently missing in the amendment issued. It is being included in this package for inclusion into the amendment package.



A. DESCRIPTION OF AMENDMENT REQUEST

The proposed changes would revise the Palo Verde Unit 1 Technical Specifications to eliminate typographical errors, provide additional clarification, improve consistency, adjust nomenclature and bring the Technical Specifications in line with the guidance in recent Generic Letters. It would also bring portions of the Technical Specifications into conformance with current NRC staff positions, incorporate Unit 2 information where appropriate, and make other minor changes.

B. PURPOSE OF THE TECHNICAL SPECIFICATIONS

The Technical Specifications are derived from the analyses and evaluation included in the Safety Analyses Report, and amendments thereto.

The Technical Specifications include items in the following categories:

- (1) Safety limits, limiting safety system settings, and limiting control settings
- (2) Limiting conditions for operation
- (3) Surveillance requirements
- (4) Design features
- (5) Administrative controls
- (6) Initial notification
- (7) Written reports

The Technical Specifications provide the general requirements applicable to each of the above categories for the licensed facility.

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

A primary objective of the amendment request is to correct typographical errors, provide clarification and to achieve similar Technical Specifications document. Furthermore, the Unit 1 proposed changes have already been incorporated by the Commission into the current Unit 2 and 3 Technical Specifications as part of License No. NPF-51 and NPF-65, respectively.

D. BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

1. The Commission has provided standards for determining whether significant hazards consideration exists as stated in 10 CFR 50.92. A proposed amendment to an operating license for a facility involves no significant

hazards consideration if operation of the facility in accordance with a proposed amendment 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.

A discussion of these standards as they relate to the amendment request follows:

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

The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because the changes do not alter the current design of the facility. The Technical Specifications are being changed to eliminate typographical errors, provide additional clarification, improve consistency, adjust nomenclature and agree with the actual design and operations of the facility. Based on this information it has been determined that the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes do not vary, affect or provide any physical changes to the facility. The proposed amendment only makes minor changes to improve clarification and consistency in line with the actual design and operation of the plant, therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Standard 3--Involve a significant reduction in a margin of safety.

The proposed amendment does not involve a significant reduction in a margin of safety because the changes do not affect the design basis of the plant. The changes address administrative corrections, such as; provide additional clarification, improve consistency, adjust nomenclature, bring portions of the Technical Specifications into conformance with current NRC staff positions, incorporate Unit 2 information where appropriate, and make other minor changes. Based on this, the changes as presented do not involve a significant reduction in a margin of safety.

2. The proposed amendment matches several of the examples given in 51 FR 7751 of amendments that do not involve a significant hazards consideration. Specifically; (i) A purely administrative change to a Technical Specification, (ii) A change that constitutes an additional limitation, restriction or control not presently included in the Technical Specifications, (vi) A change which either may result in some increase to



the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the standard Review Plan, (vii) A change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations.

E. SAFETY ANALYSIS OF THE PROPOSED CHANGE REQUEST

The proposed Technical Specification changes will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR. These changes are in accordance with the previously evaluated design of the plant, in that the changes represent corrections to typographical errors, additional clarification, adjustment to nomenclature and brings the Technical Specifications into conformance with the guidance in recent Generic Letters and NRC staff positions. The proposed Technical Specifications change will not create the possibility of an accident or malfunction of a different type than any evaluated previously in the FSAR. No physical changes are being made to the facility and these changes only revise the Technical Specifications to reflect the actual design and operation of the plant.

The proposed Technical Specifications changes will not reduce the margin of safety as defined in the basis for any Technical Specifications because the changes do not affect the design basis of the plant. The changes eliminate typographical errors, provide additional clarification and improve consistency of the Technical Specifications.

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed change 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 the 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.

G. MARKED-UP TECHNICAL SPECIFICATION CHANGE PAGES

(see attached pages)

## H. CATEGORIES OF CHANGES

The proposed changes to the Technical Specifications are similar to several examples in that they are either: administrative (i), more restrictive (ii), are within the safety analysis (vi), or respond to changes in regulations (vii). The following is a description of how the proposed changes items are similar to the examples of 51 FR 7751. (Note the items are enumerated the same as the index).

The proposed changes in the Technical Specifications for the items listed below are for eliminating typographical errors, correcting punctuation, pagination and additional clarification. They are encompassed by the Commission's example (i) of actions not likely to involve significant hazards considerations. The proposed changes are items: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 53, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 74, 79, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 97, 98, 99, 100, 102, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 116, 117, 118, 120, 121, 122, 123, 124, 125, 128, 129, 130, 131, 132, 133, 135, 136, 137, 138, 139, 140, 141, 143, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 158, 161, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 204, 205, 208, 192, and 210.

Proposed changes 35, 96, 115, 126 and 207 introduce additional operational controls and restrictions, surveillance testing and verification requirements, and more restrictive ACTION items than those presently included in the Technical Specification. These proposed changes are thus similar to example (ii) of 51 FR 7751 in that they provide additional restrictions and controls not presently included in the Technical Specifications.

The proposed changes presented in items: 20, 52, 54, 73, 75, 76, 77, 78, 80, 101, 127, 134, 142, 145, 157, 189, 203, 211 and 212 constitute changes to previously analyzed occurrences, but the results of the changes are clearly within all acceptable criteria with respect to the system or the component as described in the safety analysis. The proposed changes are thus similar to example (vi) of 51 FR 7751 of actions not likely to involve a significant hazards consideration.

The proposed changes presented in items: 103, 119, 144, 159, 160, 162, 206, and 209 constitute changes made to conform to change in the regulations and are thus similar to example (vii) of 51 FR 7751 of actions not likely to involve a significant hazards consideration.

All of the above changes have already been incorporated by the Commission into the current Unit 2 Technical Specifications issued with full-power license NPF-51 and into the Unit 3 low power license NPF-65. Incorporation of these same changes into Unit 1 Technical Specification will upgrade the specifications and make them essentially equivalent in terms of content, style and format.

## ATTACHMENT 1

### A. DESCRIPTION OF AMENDMENT REQUEST

The proposed change in the Technical Specification (Sections Table 3.3-6, Table 3.3-13, 6.5.3.5.1, 6.16, and Index) is to delete the administrative controls which require the Pre-Planned Alternate Sampling Program (PASP) to be approved by the Regional Administrator, Region V, prior to its implementation, and to delete the Technical Specification administrative controls imposed on the PASP.

### B. PURPOSE OF THE TECHNICAL SPECIFICATION

The purpose of this specification is to ensure that sufficient information is available on selected plant parameters to monitor and assess given variables.

### C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

Technical Specification 6.16 currently requires that the PASP be approved by the Regional Administrator prior to implementation, and that the PASP and its implementing procedures be audited at least once per 24 months. These requirements are redundant in nature in that the PASP has a review process for approval and procedures at PVNGS are periodically audited.

### D. BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

1. The Commission has provided standards for determining whether a significant hazards consideration exists as stated in 10 CFR 50.92. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with a proposed amendment 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.

A discussion of these standards as they relate to the amendment request follows:

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

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed amendment does not alter the current design of the facility. The Technical Specifications are being changed to delete the administrative controls that are listed in section 6.16 which require in part that the PASP be approved by the Regional Administrator, prior to implementation. Based on this, it has been determined that the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated because this change does not vary, affect or provide any physical changes to the facility. The proposed change only revises the Technical Specifications to delete the administrative controls imposed on the Pre-Planned Alternate Sampling Program. Deleting these controls will in no way affect the PASP as it is already covered under plant procedures, based on this information, the change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Standard 3-- Involve a significant reduction in a margin of safety.

The requested amendment does not involve a significant reduction in a margin of safety because this change does not affect the design basis of the facility. It would only take the administrative controls for the PASP out of the Technical Specifications and place the controls with the plant procedures. The PASP will not change as result of this proposed amendment. Based on these considerations, we have determined that the proposed change does not involve a significant hazards consideration.

2. The proposed amendment matches one of the examples given in 51 FR 7751 of amendments that do not involve a significant hazards consideration. Specifically, the proposed amendment is a change to achieve consistency (Example i) throughout the Technical Specifications.

E. SAFETY ANALYSIS OF THE PROPOSED CHANGE REQUEST

The proposed Technical Specification change will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR. This change is in accordance with the standard Technical Specifications and will only delete the Technical Specification administrative controls over the PASP.

The proposed Technical Specification change will not create the possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. No physical changes are being made to the facility and the change only deletes those specifications which are covered in other documents.

The proposed Technical Specification change will not reduce the margin of safety as defined in the basis for any Technical Specification. The basis for the PASP is to ensure that sufficient information is available on selected plant parameters to monitor and assess given variables.

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed change 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 the 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.

G. MARKED-UP TECHNICAL SPECIFICATION CHANGE PAGES

(see attached pages XVIII, 3/4 3-38, 3/4 3-39, 3/4 3-75, 3/4 3-76, 6-12 and 6-25)

## ATTACHMENT 2

### A. DESCRIPTION OF AMENDMENT REQUEST

The proposed amendment request would modify Technical Specifications 3.4.7, 4.4.7, 6.9.1.5 and B 3/4.4.7 by changing the requirements from a Licensee Event Report to a Special Report for operating conditions where the specific activity limits of the reactor coolant are exceeded. Also, the existing requirements to shutdown a plant if coolant iodine activity limits are exceeded for 800 hours in a 12-month period are to be eliminated.

### B. PURPOSE OF THE TECHNICAL SPECIFICATION

The limitations on the specific activity of the primary coolant ensure that the resulting 2-hour doses at the site boundary will not exceed an appropriately small fraction of Part 100 limits following a steam generator tube rupture accident in conjunction with an assumed steady state primary-to-secondary steam generator leakage rate of 1.0 gpm and a concurrent loss-of-offsite electrical power. The values for the limits on specific activity represent limits based upon a parametric evaluation by the NRC of typical site locations. These values are conservative in that specific site parameters of the Palo Verde site, such as site boundary location and meteorological conditions, were not considered in this evaluation.

### C. NEED FOR THE SPECIFICATION AMENDMENT

Generic Letter 85-19, Reporting Requirements on Primary Coolant Iodine Spikes, dated September 27, 1985; states that "A Technical Specification amendment request should be submitted to the NRC for each facility which currently has Technical Specification reporting requirements upon exceeding coolant iodine activity limits or which has a requirement to shut down after 800 hours with iodine above the limit." In an effort to delete unnecessary reporting requirements, we have followed the guidance of the Generic Letter.

### D. BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION

1. The commission has provided standards for determining whether a significant hazards consideration exists as stated in 10 CFR 50.92. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with a proposed amendment 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.

A discussion of these standards as they relate to the amendment request follows:

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

The proposed change does not involve a significant increase in the

probability or consequences of an accident previously evaluated because the proposed change does not alter the current design of the facility. The Technical Specifications are being changed as part of a continuing program to delete unnecessary reporting requirements. The staff has reviewed the reporting requirements related to primary coolant specific activity levels and specifically primary coolant iodine spikes, and have determined that the reporting requirements for iodine spiking can be reduced from a short-term report to an item which is to be included in the Annual Report. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed amendment does not vary, affect or provide any physical changes to the facility. This proposed change only revises the Technical Specification coolant iodine activity limit which is considered no longer necessary on the basis that proper fuel management by licensees and existing reporting requirements should preclude ever approaching the limit. For these reasons it has been determined that the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Standard 3--Involve a significant reduction in a margin of safety.

The requested amendment does not involve a significant reduction in a margin of safety because the proposed change does not affect the design bases for the plant. The existing requirements to shutdown a plant if coolant iodine activity limits are exceeded for 800 hours in a 12-month period can be eliminated because the quality of nuclear fuel has been greatly improved with the result that normal coolant iodine activity (ie. in the absence of iodine spiking) is well below the limit. Appropriate actions would be initiated long before accumulating 800 hours above the iodine activity limit. In addition, 10 CFR 50.72 (b)(1)(ii) requires the NRC to be immediately notified of fuel cladding failures that exceed expected values or that are caused by unexpected factors. For these reasons, it has been determined that the change does not involve a significant reduction in the margin of safety.

2. The proposed amendment matches one of the examples given in 51 FR 7751 of amendments that do not involve a significant hazards consideration. Specifically, the proposed amendment is a change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations (Example vii).

#### E. SAFETY ANALYSIS OF THE PROPOSED CHANGE REQUEST

The proposed Technical Specification change will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR. This change is in

accordance with the previously evaluated design of the plant. Generic letter 85-19 dated September 27, 1985 provided guidance on Technical Specification revisions required as the result of the revisions to 10 CFR 50.72 and of implementation of 10 CFR 50.73. Thus, this change is in accordance with the original plant design.

The proposed Technical Specification change will not create the possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. No physical changes are being made to the plant and this change only revises the Technical Specifications to reflect a regulatory change.

The proposed Technical Specification change will not reduce the margin of safety as defined in the basis for any Technical Specifications. The basis for Technical Specifications 3.4.7 incorporates the limitations on the specific activity of the primary coolant to ensure that the resulting 2-hour doses at the site boundary will not exceed an appropriately small fraction of part 100 limits following a steam generator leakage rate of 1.0 gpm and a concurrent loss-of-offsite electrical power. This change does not affect these bases since assurance is provided in that the quality of nuclear fuel has been greatly improved with the result that normal coolant iodine activity (ie. in the absence of iodine spiking) is well below the limit. And appropriate actions would be initiated long before accumulating 800 hours above the iodine activity limit. In addition, 10 CFR 50.72 (b)(1)(ii) requires the NRC to be immediately notified of fuel cladding failures that exceed expected values or that are caused by unexpected factors.

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed change request does not involve an unreviewed environment 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 the 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.

G. MARKED-UP TECHNICAL SPECIFICATION CHANGE PAGES

(see attached pages; XIX,3/4 4-25,3/4 4-26,6-17, and B 3/4 4-5)

