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SUBJECT: Supplemental application for amend to License NPF-41,
 changing preplanned alternate sampling program & RCS
 specific activity.

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Arizona Nuclear Power Project

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August 7, 1987
161-00429-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)
Additional Information Concerning
Technical Specification Change
File: 87-F-005.419.05; 87-056-026

Reference: Letter from J. G. Haynes (ANPP) to USNRC
Document Control Desk dated May 25, 1987
(161-00240-JGH/JRP).

Dear Sir:

Attached please find miscellaneous change pages which are to supersede those pages submitted by the referenced letter. These changes, which are to support the Technical Specification change request, have been discussed with Mr. E. A. Licitra of your staff. Included within the attachment are the following: 1) Pages which are affected by changes to the Pre-Planned Alternate Sampling Program (PASP); 2) Pages which are affected by changes to the Reactor Coolant System specific activity; 3) Changes to listing of proposed changes (Enclosure 1); and 4) Changes to Section H of (Enclosure 2).

Pursuant to 10 CFR 50.91(b), 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.

If you have any questions or concerns please call J. R. Provasoli of my staff at (602) 371-4160.

Very truly yours,

J. G. Haynes
Vice President
Nuclear Production

JGH/JRP/lrs
Attachment

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USNRC Document Control Desk
Additional Information Concerning
Technical Specification Change
161-00429
Page 2

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

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 (Attachment 2).
7. Page VI, INDEX; in Section 3/4.4.8 PRESSURIZER HEATUP/COOLDOWN LIMITS, change 3/4 4-32 to 3/4 4-31 (Attachment 2).
8. Page VI, INDEX; in Section 3/4.4.8 OVERPRESSURE PROTECTION SYSTEMS, change 3/4 4-33 to 3/4 4-32 (Attachment 2).
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 (Attachment 2).
17. Page XVII, INDEX; in Section 6.9.1 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATION REPORT, change 6-17 to 6-18 (Attachment 2).

18. Page XVII, INDEX; in Section 6.9.1 SEMI ANNUAL RADIOLOGICAL EFFLUENT RELEASE REPORT, change 6-18 to 6-19 (Attachment 2).
19. Page XVIII, INDEX; in Section 6.14 OFFSITE DOSE CALCULATION MANUAL, change 6-23 to 6-24 (Attachment 2).
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 (Attachment 2).
22. Page XIX, INDEX; List of Figures; Figure 3.4-2 change 3/4 4-30 to 3/4 4-29 (Attachment 2).
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.

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 (Attachment 1).
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

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 (Attachment 1).

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 (Attachment 1).
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.

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 (Attachment 2).
105. Page 3/4 4-27, TABLE 4.4-4, change this page to 3/4 4-26 (Attachment 2.)
106. Page 3/4 4-28, FIGURE 3.4-1, this page should be renumbered to 3/4 4-27 (Attachment 2).
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 (Attachment 2).
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 (Attachment 2).
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 (Attachment 2).
113. Page 3/4 4-32, this page should be renumbered to 3/4 4-31 (Attachment 2).
114. page 3/4 4-33, this page should be renumbered to 3/4 4-32 (Attachment 2).
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.

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 174.

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-DO102
E-RCN-DO101
E-RCN-DO301
E-RCN-DO302
E-RCN-DO201
E-RCN-DO202
E-RCN-DO401
E-RCN-DO402

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

E-NAN-SO2M	
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

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 Δt .
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 (Attachment 1).

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), 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, 20, 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, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 97, 98, 99, 100, 101, 102, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 120, 121, 122, 123, 124, 125, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 161, 162, 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, 203, 204, 205, 208, 210, 211, and 212.

Proposed changes 35, 80, 96, 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: 103, 119, 159, 160, 189, 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.

