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SUBJECT: Application for amends to licenses NPF-41,NPF-51 & NPF-74,  
making administrative change to TS 5.5.2 & 5.6.2.

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102-04344 – DM/AKK/SAB  
September 14, 1999

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. STN 50-528/529/530  
Proposed Administrative Amendments to Technical  
Specifications 5.5.2, and 5.6.2**

Arizona Public Service Company (APS) is requesting NRC review and approval of the following administrative changes to the PVNGS Technical Specifications (TS):

- 1) Revise TS 5.5.2, Primary Coolant Sources Outside Containment, to delete the references to the post-accident sampling (PASS) return piping of the radioactive waste gas system and the liquid radwaste system. These references are misleading since the PVNGS PASS does not have return lines to the radioactive waste gas or liquid radwaste systems. The PASS return piping that is subject to the requirements of TS 5.5.2 (and is included in the PVNGS program required by TS 5.5.2) is part of the PASS reactor coolant sampling and PASS containment atmosphere sampling systems.
- 2) Revise TS 5.6.2, Annual Radiological Environmental Operating Report, to delete the administrative requirement that states: "[t]he report shall identify the TLD results that represent collocated dosimeters in relation to the NRC TLD program and the exposure period associated with each result." The NRC ended their TLD program at the end of 1997, therefore this reporting requirement is no longer valid.

Provided in the Enclosures to this letter are the following sections which support the proposed changes:

- A. Description of the Proposed Technical Specification Amendment
- B. Purpose of the Technical Specification
- C. Need for the Technical Specification Amendment
- D. Safety Analysis for the Proposed Technical Specification Amendment
- E. No Significant Hazards Consideration Determination
- F. Environmental Consideration
- G. Marked-up Technical Specification Page
- H. Retyped Technical Specification Page

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Page 2

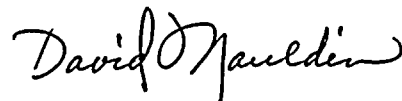
APS requests 60 days for implementation following the issuance of this amendment.

In accordance with the PVNGS quality assurance program, the Plant Review Board and the Offsite Safety Review Committee have reviewed and concurred with this request. By copy of this letter, this submittal is being forwarded to the Arizona Radiation Regulatory Agency (ARRA) pursuant to 10 CFR 50.91(b)(1).

No commitments are being made to the NRC by this letter.

Should you have any questions, please contact Scott A. Bauer of my staff at (623) 393-5978.

Sincerely,



DM/AKK/SAB/GAM

- Enclosure 1: Proposed Amendment to Palo Verde Technical Specification 5.5.2,  
Primary Coolant Sources Outside Containment  
Enclosure 2: Proposed Amendment to Palo Verde Technical Specification 5.6.2,  
Annual Radiological Environmental Operating Report

cc:	E. W. Merschoff	NRC Region IV
	N. Kalyanam	NRR Project Manager
	J. H. Moorman	NRC Resident Inspector
	A. V. Godwin	ARRA



STATE OF ARIZONA       )  
                                  ) ss.  
COUNTY OF MARICOPA   )

I, David Mauldin, represent that I am Vice President Nuclear Engineering and Support, Arizona Public Service Company (APS), that the foregoing document has been signed by me on behalf of APS with full authority to do so, and that to the best of my knowledge and belief, the statements made therein are true and correct.

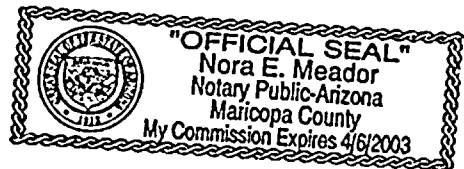
David Mauldin  
David Mauldin

Sworn To Before Me This 14 Day Of September, 1999.

Nora E. Meador  
Notary Public

My Commission Expires

April 6, 2003



**Enclosure 1**

**Proposed Amendment to Palo Verde  
Technical Specification 5.5.2,  
Primary Coolant Sources Outside Containment**





**A. DESCRIPTION OF THE PROPOSED TECHNICAL SPECIFICATION AMENDMENT**

The proposed administrative change to Technical Specification (TS) 5.5.2, Primary Coolant Sources Outside Containment, would revise TS 5.5.2, Primary Coolant Sources Outside Containment to delete the references to "... the post-accident sampling return piping of the radioactive waste gas system...", and "... the post-accident sampling return piping of the liquid radwaste system ...." These references are potentially misleading because the PVNGS post accident sampling system (PASS) does not have return lines to the radioactive waste gas or liquid radwaste systems. There is no physical connection between the PASS piping and the radioactive waste gas or liquid radwaste systems. The PASS return piping that is subject to the requirements of TS 5.5.2 (and is included in the PVNGS program required by TS 5.5.2) is part of the PASS reactor coolant sampling and PASS containment atmosphere sampling systems.

**B. PURPOSE OF THE TECHNICAL SPECIFICATION**

The program required by TS 5.5.2, Primary Coolant Sources Outside Containment, provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The post accident sampling system (PASS) for reactor coolant sampling and containment atmosphere sampling contains piping in this category. The PASS return piping is considered to be part of the PASS piping for the TS 5.5.2 program. However, the radioactive waste gas system and the liquid radwaste system are not part of PASS and would not contain highly radioactive fluids during a serious transient or accident. There is no physical connection between the PASS piping and the radioactive waste gas or liquid radwaste systems.

The potentially misleading references in this TS for the PASS return piping have been in the Palo Verde TSs since original plant licensing. This wording was not in the original Combustion Engineering (CE) Standard TSs that were the model for the original Palo Verde TSs. It is speculated that this wording resulted from using wording from other CE plants that identify their systems differently from Palo Verde.

**C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT**

The current references to "... the post-accident sampling return piping of the radioactive waste gas system...", and "... the post-accident sampling return piping of the liquid radwaste system ...." in TS 5.5.2 are potentially misleading because the PVNGS post accident sampling system (PASS) does not have return lines to the radioactive waste gas or liquid radwaste systems. The PASS return piping that is subject to the requirements of TS 5.5.2 (and is included in the PVNGS program required by TS 5.5.2) is part of the PASS reactor coolant sampling and PASS containment atmosphere sampling systems. There is no



physical connection between the PASS piping and the radioactive waste gas or liquid radwaste systems. This proposed administrative change would clarify the PASS piping subject to the leakage control program requirements of TS 5.5.2, but would not delete or change any piping currently subject to that program.

**D. SAFETY ANALYSIS FOR THE PROPOSED TECHNICAL SPECIFICATION AMENDMENT**

This proposed administrative change to Technical Specification (TS) 5.5.2, Primary Coolant Sources Outside Containment, would delete the references to "... the post-accident sampling return piping of the radioactive waste gas system....," and "... the post-accident sampling return piping of the liquid radwaste system ...." No requirements would be altered by this proposed change because the PVNGS post accident sampling system (PASS) does not have return lines to the radioactive waste gas or liquid radwaste systems. There is no physical connection between the PASS piping and the radioactive waste gas or liquid radwaste systems. The PASS return piping that is subject to the requirements of TS 5.5.2 (and is included in the PVNGS program required by TS 5.5.2) is part of the PASS reactor coolant sampling and PASS containment atmosphere sampling systems. The radioactive waste gas system and the liquid radwaste system are not part of PASS and would not contain highly radioactive fluids during a serious transient or accident to be subject to TS 5.5.2. This administrative change would involve no change to the design or maintenance of the plant and no changes in the functional requirements of any system.

**E. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION**

Standard 1 -- Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

**No** - This proposed administrative change to Technical Specification (TS) 5.5.2 to delete references to the radioactive waste gas system and liquid radwaste system in the context of the post accident sampling system (PASS) does not involve a significant increase in the probability or consequences of an accident previously evaluated. Leak testing requirements of the PASS return piping are included in the TS 5.5.2 requirements that are not being changed. The appropriate PASS piping, including return piping, is leak tested per the prescribed requirements in TS 5.5.2. This administrative change would simply clarify TS 5.5.2, since the PASS return piping is not part of the waste gas or liquid radwaste systems. There is no physical connection between the PASS piping and the radioactive waste gas or liquid radwaste systems. The radioactive waste gas system and the liquid radwaste system are not part of PASS and would not contain highly radioactive fluids during a serious transient or accident to be subject to TS 5.5.2. This administrative change would involve no change to the design or maintenance of the plant and no changes in the functional requirements of any system.



Standard 2 -- Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

**No** - This proposed administrative change to delete references to the radioactive waste gas system and liquid radwaste system in the context of PASS does not create the possibility of a new or different kind of accident from any accident previously evaluated. Leak testing requirements of the PASS return piping are implicitly included in the TS 5.5.2 requirements that are not being changed. The appropriate PASS piping, including return piping, is leak tested per the prescribed requirements in TS 5.5.2. There is no physical connection between the PASS piping and the radioactive waste gas or liquid radwaste systems. The radioactive waste gas system and the liquid radwaste system are not part of PASS and would not contain highly radioactive fluids during a serious transient or accident to be subject to TS 5.5.2. This administrative change would involve no change to the design or maintenance of the plant and no changes in the functional requirements of any system. This administrative change would simply clarify TS 5.5.2, since the PASS return piping is not part of the waste gas or liquid radwaste systems.

Standard 3 -- Does the proposed change involve a significant reduction in a margin of safety?

**No** - This proposed administrative change does not involve a significant reduction in a margin of safety. There is no margin of safety associated with this proposed administrative change to Technical Specification 5.5.2. Leak testing requirements of the PASS return piping are implicitly included in the TS 5.5.2 requirements that are not being changed. The appropriate PASS piping, including return piping, is leak tested per the prescribed requirements in TS 5.5.2. This administrative change would involve no change to the design or maintenance of the plant and no changes in the functional requirements of any system. This administrative change would simply clarify TS 5.5.2, since the PASS return piping is not part of the waste gas or liquid radwaste systems.

**F. ENVIRONMENTAL CONSIDERATION**

APS has determined that the proposed amendment involves no changes in the amount or type of effluent that may be released offsite, and results in no increase in individual or cumulative occupational radiation exposure. As described above, the proposed TS amendment involves no significant hazards consideration and, as such, meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9).

