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SUBJECT: Application for amend to License NPF-51, revising Tech Spec Surveillance Requirement 4.7.9.b to postpone first inservice visual insp of 25 snubbers in containment spray sys until first refueling outage.

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Arizona Nuclear Power Project
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December 26, 1986
ANPP-39507-JGH/BJA/98.05

Director of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Project Director
PWR Project Directorate #7
Division of Pressurized Water Reactor Licensing - B
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 2
Docket No. STN 50-529 (License No. NPF-51)
Proposed Technical Specification Change - Snubber Visual Inspections
File: 86-F-056-026; 86-F-005-419.05

Dear Mr. Knighton:

The purpose of this letter is to request a change to the PVNGS Unit 2 Technical Specifications. The proposed change revises Technical Specification Surveillance Requirement 4.7.9.b to postpone the first inservice visual inspection of 25 snubbers in the containment spray system until the first refueling outage. The remainder of the PVNGS Unit 2 snubbers will be visually inspected in accordance with the current Technical Specification requirements.

Enclosed within this change request package are the following:

A. Description of the Proposed Change.

B. Purpose of the Technical Specification.

C. Need for the Technical Specification Amendment.

D. Basis for No Significant Hazards Consideration.

E. Safety Evaluation for the Proposed Change.

F. Environment Impact Consideration Determination.

G. Marked-Up Technical Specification Change Page.

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Pursuant to the requirements of 10CFR50.91(b)(1), and by copy of this letter, we have notified the Arizona Radiation Regulatory Agency of this request for a Technical Specification change. In accordance with the requirements of 10CFR170.12(c), the license amendment application fee of $150 is also enclosed.

Very truly yours,

JGHaynes

J. G. Haynes
Vice President
Nuclear Production

JGH/BJA/dlm
Attachment

cc: O. M. DeMichele (all w/a)
E. E. Van Brunt, Jr.
E. A. Licitra
R. P. Zimmerman
C. F. Tedford (Director-ARRA)
A. C. Gehr

A. DESCRIPTION OF THE PROPOSED CHANGE

This proposed Technical Specification change revises Surveillance Requirement 4.7.9.b of the PVNGS Unit 2 Technical Specifications to postpone the first inservice visual inspection of 25 snubbers in the containment spray system to the first refueling outage. Presently, the Technical Specifications require the first inservice visual inspection to be conducted within 10 months after commencing power operations on Unit 2. The 25 snubbers that are the subject of this request are a part of the containment spray system and are located in the dome region of the containment building. The following is a list of the 25 snubbers that are the subject of this Technical Specification change request. Please note that some of the hanger locations contain two snubbers. These locations are denoted by a "2" in parenthesis after the hanger equipment identification number.

2-SI-088-H-029
2-SI-381-H-004
2-SI-381-H-008
2-SI-088-H-013
2-SI-088-H-016 (2)
2-SI-088-H-033
2-SI-380-H-005
2-SI-331-H-003 (2)
2-SI-377-H-002 (2)
2-SI-377-H-004 (2)
2-SI-377-H-007 (2)
2-SI-130-H-022
2-SI-321-H-003 (2)
2-SI-378-H-002 (2)
2-SI-378-H-004 (2)
2-SI-378-H-007 (2)

This Technical Specification change would postpone the initial inservice visual inspection for these 25 snubbers until the first refueling outage. The current Technical Specification would require visual inspection of the 25 snubbers within 10 months after commencing power operations on PVNGS Unit 2. Therefore, the postponement would result in an approximate 1 year delay for the initial inservice visual inspection of the 25 snubbers. This is based upon the estimated date of February, 1988 for the first refueling outage on PVNGS Unit 2. During this one year time delay, satisfactory operation of the snubbers is assured by the following:

1. The 25 containment spray system snubbers in PVNGS Unit 2 successfully passed their preservice snubber inspection. This preservice examination included both a visual inspection and a movement verification for each snubber.

2. Since the time of the preservice snubber inspection, the portion of the containment spray system that contains the 25 snubbers has not been operated with water, subjected to any transients, or subjected to any of the thermal and mechanical stresses that would normally be associated with system operation.

3. These 25 snubbers are located in the dome region of the containment building. This area is normally inaccessible to plant or craft personnel. This inaccessability lessens the likelihood of snubber damage due to the activities of personnel.

4. The 25 containment spray system snubbers have received their initial inservice visual inspection in PVNGS Unit 1. This inspection did not yield any unfavorable results for these 25 snubbers.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

The purpose of Technical Specification 3.7.9 and the associated Surveillance Requirements is to ensure the operability of all mechanical and hydraulic snubbers at PVNGS Unit 2. The operability of the snubbers helps to ensure the structural integrity of the reactor coolant system and all other safety-related systems during and following a seismic or other event initiating dynamic loads. The purpose of the 25 snubbers that are the subject of this amendment request are to ensure the structural integrity of the containment spray system during seismic or other events initiating dynamic loads.

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

Technical Specification surveillance requirement 4.7.9.b requires that the first inservice visual inspection of all snubbers be performed within 10 months after commencing power operations. The second inservice visual inspection is required during the first refueling outage. Additionally, snubber functional tests are started at the first refueling outage.

The visual inspection of the 25 containment spray system snubbers requires an extensive staging operation in order to install the inspection platform that is necessary to gain access to the snubbers. Furthermore, the installation of the inspection platform and the inspection itself are difficult tasks due to the hazards involved with working at high elevations inside the containment building. This Technical Specification change would eliminate the need to perform this difficult inspection task during the first cycle of operation for PVNGS Unit 2. It should be noted that the visual inspection will be performed during the first refueling outage. Access to the containment spray system snubbers is required during the first refueling outage in order to begin performing snubber functional tests.

D. BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION

1. The Commission has provided standards for determining whether a significant hazards consideration exists as stated in 10CFR50.92. 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 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 the consequences of an accident previously evaluated:

Basis = This Technical Specification change to postpone the initial inservice visual inspection of 25 containment spray system snubbers does not involve a significant increase in the probability or the consequences of a previously evaluated accident. The containment spray system functions to limit containment pressure and temperature following a LOCA. The events that initiate a LOCA and require operation of the containment spray system are independent of the frequency of performing visual inspections on the 25 containment spray system snubbers. Additionally, the consequences of previously evaluated accidents are not increased by this change. The satisfactory operation of the containment spray system under accident conditions will ensure that the consequences of previously evaluated accidents are not increased. Satisfactory operation of the containment spray system is assured by the following considerations: i) the 25 containment spray system snubbers successfully passed their preservice snubber inspection; ii) since the time of the preservice inspection, the containment spray system has not been operated with water, subjected to transients, or subjected to thermal and mechanical stresses; and iii) the 25 snubbers are normally inaccessible to plant or craft personnel which lessons the likelihood of snubber damage due to personnel activities. For these reasons, there is adequate assurance that the 25 snubbers will be capable of performing their safety functions.

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

Basis = This Technical Specification change will not create the possibility of a new or different kind of accident from any accident previously analyzed. This portion of the containment spray system has been inactive and relatively inaccessible since the preservice inspection of the 25 snubbers involved with this Technical Specification change. For these reasons, there is adequate assurance that the 25 snubbers will be capable of ensuring the integrity and operability of the containment spray system. Thus, the containment spray system will be capable of performing its functions of protecting containment integrity by limiting containment pressure and temperature. The limitations on containment pressure and temperature ensure that equipment inside containment

operate in an environment that they are qualified for. In conclusion, the operability of the containment spray system and limiting the environmental parameters inside containment assures that no new or different kinds of accidents are created.

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

Basis = This Technical Specification change does not involve a significant reduction in a margin of safety. The basis for Technical Specification 3.7.9 concerning snubbers is to ensure the structural integrity of the reactor coolant system and all other safety related systems during and following a seismic event or another event initiating dynamic loads. The 25 snubbers that are the subject of this Technical Specification change act to ensure the integrity of the containment spray system. There is adequate assurance that these 25 snubbers will perform their required function due to the successful completion of the preservice snubber inspection and due to the relative inactivity and inaccessibility of the snubbers since the preservice inspection. Therefore, the margin of safety as defined in the basis for Technical Specification 3.7.9 is not reduced.

2. The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48FR14870) of amendments that are considered least likely to involve a significant hazards consideration. This proposed Technical Specification change does not match any of the examples given in 48FR14870 but this change can be described as a relief from an inspection requirement based upon demonstrating acceptable equipment operation through previous inspection and subsequent equipment inactivity.

E. SAFETY EVALUATION FOR THE PROPOSED CHANGE

The proposed Technical Specification change will not increase the probability or the consequences of any accidents previously evaluated in the FSAR. The 25 snubbers in the containment spray system are designed to ensure the structural integrity of the containment spray system during a seismic event or a transient event on the system. The containment spray system itself acts to reduce containment pressure and temperature following a Loss of Coolant Accident (LOCA) or a Main Steam Line Break (MSLB) inside containment. The events that initiate a LOCA or a MSLB are independent of the frequency of performing visual inspections on these 25 containment spray system snubbers. Therefore, the probability of occurrence of the LOCA or MSLB accidents is not increased by this change. Additionally, the proposed change will not increase the consequences of the previously analyzed accidents due to the fact that satisfactory operation of the 25 containment spray system snubbers under accident conditions is assured by the following: i) these 25 snubbers

successfully passed their preservice snubber examination, ii) since the time of the preservice examination, this portion of the containment spray system has not been operated with water, subjected to transients, or subjected to thermal and mechanical stresses; and iii) the 25 snubbers are normally inaccessible to plant or craft personnel which lessens the likelihood of snubber damage due to personnel activities. For these reasons, there is adequate assurance that the 25 snubbers will be capable of performing their safety function.

This proposed Technical Specification change will not create the possibility of a new or different kind of accident from any accident previously evaluated. For the reasons listed above, these 25 containment spray system snubbers are capable of performing their safety function of ensuring the integrity of the containment spray system during seismic or transient events. Proper operation of the containment spray system ensures the integrity of the containment during a LOCA or a MSLB inside containment. It also ensures that the containment pressure and temperature will be maintained within the values that were used to qualify equipment inside containment. Therefore, no new types of accidents are created due to the fact that the inside containment equipment will still be operated within the design parameters.

This proposed Technical Specification change will not reduce the margin of safety as defined in the basis for any Technical Specification. The basis for the Technical Specification on these 25 snubbers is to ensure the structural integrity of the containment spray system during and following a seismic event or any other event initiating dynamic loads on the system. There is adequate assurance that these 25 snubbers will perform as required to ensure the integrity of the containment spray system due to the fact that the snubbers have successfully completed their preservice snubber examination, this portion of the containment spray system has been inactive, and these 25 snubbers have been relatively inaccessible.

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed change request does not involve an unreviewed environmental question because operation of PVNGS Unit 2 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 PAGE

(See attached page 3/4 7-21 of the PVNGS Unit 2 Technical Specifications).