



## Arizona Nuclear Power Project

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January 23, 1987  
ANPP-39831-JGH/PGN/98.05

Director of Nuclear Reactor Regulation  
Attention: Mr. G. 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)  
Units 1, 2 and 3  
Docket Nos. STN 50-528 (License NPF-41)  
STN 50-529 (License NPF-51)  
STN 50-530  
Technical Specification Amendment - Section 4.6.4.2  
File: 87-F-005-419.05; 87-B-056-026; 87-C-056-026

Dear Mr. Knighton:

Attached please find proposed changes to the PVNGS Units 1 and 2 Technical Specifications. The proposed changes expand the testing regimen for the hydrogen recombiners, set forth in T.S. 4.6.4.2.

Additionally, this change should also be considered as a change to the PVNGS Unit 3 Technical Specifications. Although PVNGS Unit 3 does not have an Operating License at this time, ANPP would like to process this change as a PVNGS Unit 3 Technical Specification change so that the administrative tasks involved with this change do not need to be repeated at a future date.

Enclosed, with this amendment request package, are the following:

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

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for \$150.00*

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By copy of this letter, we are also forwarding the proposed changes to the appropriate state agency.

In accordance with the requirements of 10 CFR 170.12(c), the license amendment application fee of \$150.00 is also enclosed.

If you have any questions, please call W. F. Quinn, at (602) 943-7200 extension 4087.

Very truly yours,



J. G. Haynes  
Vice President  
Nuclear Production

JGH/PGN/1s  
Attachments

cc: O. M. De Michele  
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R. P. Zimmerman  
J. B. Martin  
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## ATTACHMENT

### A. DESCRIPTION OF THE TECHNICAL SPECIFICATION AMENDMENT REQUEST

The proposed amendment expands the testing regimen for the hydrogen recombiner power control cabinets (PCCs), that is set forth in Technical Specification (T.S.) 4.6.4.2. The expanded testing regimen is prescribed by the vendor, and will verify proper operation of the hydrogen recombiners.

### B. PURPOSE OF THE TECHNICAL SPECIFICATION

The purpose of T.S. 4.6.4.2 is to ensure the operability of the equipment and systems required for the control of hydrogen gas, so that the equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions.

### C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

In March 1986, new hydrogen recombiner PCCs were installed to meet equipment qualification requirements. An expanded testing regimen is prescribed by the vendor to verify proper operation of the hydrogen recombiners. In addition, tests which can no longer be done with these PCCs are being deleted. This change ensures that the purpose of T.S. 4.6.4.2 is met.

### D. BASIS FOR PROPOSED 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 change would expand the testing regimen, as prescribed by the vendor, to assure proper operation of the hydrogen recombiners. Proper testing and operation of the recombiners ensures that the possibility of a new or different kind of accident from any accident previously evaluated will not be increased.

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



The proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed change would expand the testing regimen, as prescribed by the vendor, to assure proper operation of the hydrogen recombiners. Proper testing and operation of the recombiners ensures that the possibility of a new or different kind of accident from any accident previously evaluated will be not created.

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

The proposed change does not involve a significant reduction in a margin of safety because the proposed change would expand the testing regimen, as prescribed by the vendor, to assure proper operation of the hydrogen recombiners. Proper testing and operation of the recombiners ensures that the margin of safety will not be reduced.

2. The proposed amendment matches the guidance concerning the application of standards for determining whether or not a significant hazards consideration exists (51 FR 7751) by example:

- (ii) a change that constitutes an additional limitation, restriction or control not presently included in the Technical Specifications; for example, a more stringent surveillance requirement.

#### E. SAFETY EVALUATION FOR THE AMENDMENT REQUEST

The proposed technical specification amendment 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. The proposed change would expand the testing regimen to assure proper testing and operation of the hydrogen recombiners, which ensures that the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR will not be increased.

The proposed technical specification amendment will not create the possibility for an accident or malfunction of a different type than any previously evaluated in the FSAR. The proposed change would expand the testing regimen to assure proper testing and operation of the hydrogen recombiners, which ensures that the possibility of a different accident or malfunction will not be created.

The proposed technical specification amendment will not reduce the margin of safety as defined in the basis for the technical specifications. The proposed change would expand the testing regimen to assure proper testing and operation of the hydrogen recombiners, which ensures that the margin of safety is maintained.

#### F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed change request does not involve an unreviewed environmental question because operation of PVNGS Units 1 and 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; 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

Limiting Conditions For Operation And Surveillance Requirements:

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