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 FACIL: STN-50-52B Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528
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 VAN BRUNT, E. E. Arizona Nuclear Power Project (formerly Arizona Public Serv
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Application for amend to License NPF-41, changing Tech Specs
 Section 3/4.11.1 re secondary sys liquid waste discharges to
 onsite evaporation ponds on one-time-only basis. Fee paid.

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NOTES: Standardized plant. M. Davis, NRR: 1Cy.

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INTERNAL:	ACRS	6	6	ADM/LFMB	1	0
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1. The purpose of this document is to provide a summary of the information received from the source regarding the activities of the group. The information was obtained from a confidential source who has provided reliable information in the past.

2. The source has provided information regarding the activities of the group, including the names of the individuals involved, the locations of the meetings, and the nature of the activities. The information was obtained from a confidential source who has provided reliable information in the past.

3. The information was obtained from a confidential source who has provided reliable information in the past. The source has provided information regarding the activities of the group, including the names of the individuals involved, the locations of the meetings, and the nature of the activities.

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Arizona Nuclear Power Project

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March 23, 1987
161-00100-EEVB/JRP

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

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

Dear Sir:

Per conversation with E. A. Licitra and other NRC staff on March 23, 1987, submitted herewith is a one-time only request for an Emergency Technical Specification Change to the Unit 1 Technical Specifications Section 3/4.11.1, secondary system liquid waste discharges to onsite evaporation ponds. The requested period of this one-time only Emergency Technical Specification Change, is to begin at 8:00 am MST on March 24, 1987, and is to expire at 11:59 pm PST on May 23, 1987.

This change is required expeditiously in that failure to act in a timely way would result in derating and shutdown of the unit.

The proposed change will allow the concentration of radioactive materials discharged from the secondary liquid waste to the onsite evaporation ponds, to exceed 5×10^{-7} uCi/ml (gamma emitters with half lives less than 75 days). This discharge will be within the guidelines of 10 CFR Part 20, Appendix B, Table II, Col. 2, concentrations for a period not to exceed 60 days.

The continued operation of Unit 1 will not result in an unsafe condition as the proposed change is within the limits of 10 CFR Part 20, Appendix B.

Enclosed within this change request are:

- A. Description of Proposed Change Request
- B. Purpose of the Technical Specification
- C. Justification for the Emergency Classification
- D. Basis for No Significant Hazards Consideration
- E. Safety Analysis of the Proposed Change Request
- F. Environmental Impact Consideration Determination
- G. Markedup Technical Specifications

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U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Subject: Request for One Time Only
Technical Specification Change

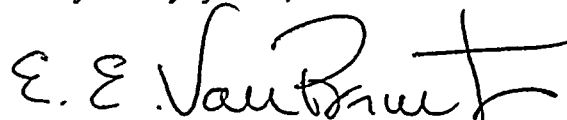
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Please be advised that a Technical Specification amendment request will be forth coming for Units 1, 2 and 3 to permanently change this section and also incorporate Region V comments.

Pursuant to 10 CFR 50.91(b)(1), and by copy of this letter, we have notified the Arizona Radiation Regulatory Agency of our request for a Emergency Technical Specification change. In accordance with 10 CFR 170.12(c), the license amendment application fee of \$150 has been forwarded to the USNRC License Fee Management Coordinator.

If you have any questions or concerns, please call Joseph R. Provasoli at (602) 371-4160.

Very truly yours,



E. E. Van Brunt, Jr.
Executive Vice President
Project Director

EEVB/JRP/rw
Attachment

cc: O. M. De Michele
J. G. Haynes
G. W. Knighton (w/a)
J. B. Martin (w/a)
E. A. Licitra (w/a)
R. P. Zimmerman (w/a)
R. M. Diggs (with WFD \$150.00)
C. F. Tedford (w/a)
A. C. Gehr (w/a)

ATTACHMENT

A. DESCRIPTION OF PROPOSED CHANGE REQUEST

The proposed change request would modify Technical Specification 3.11.1.1 by changing the specification to allow (effective March 24, 1987) the concentration of radioactive materials discharged from the secondary liquid waste to the onsite evaporation ponds, to exceed 5×10^{-7} uCi/ml (gamma emitters with half lives less than 75 days), but limited to 10 CFR 20, Appendix B. Table II, Col. 2 concentration for a period not to exceed 60 days.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

This specification is provided to ensure that at any time during the life of the nuclear station, the annual total body dose due to ground contamination of an UNRESTRICTED AREA, arising from transportation and deposition by wind of the accumulated activity discharged to the pond from the secondary system of the plant (if the pond gets dried up) on the UNRESTRICTED AREA, is within the guidelines of 10 CFR Part 20 for the above-mentioned postulated event.

Restricting the concentrations of the secondary liquid wastes discharged to the onsite evaporation ponds will restrict the quantity of radioactive material that can get accumulated in the ponds. This, in turn, provides assurance that in the event of an uncontrolled release of the pond's contents to an UNRESTRICTED AREA, the resulting total body annual exposure from ground contamination to a MEMBER OF THE PUBLIC at the nearest exclusion area boundary will be within 0.5 rem.

This specification applies to the secondary system liquid waste discharges of radioactive materials from all reactor units to the onsite evaporation ponds. Since the chemical neutralizer tank concentrations will bound concentrations in other secondary waste discharges, surveillance requirements stipulate that sampling and analysis of other secondary waste discharges need be performed only if the sampling and analysis of the contents of the chemical neutralizer tank shows that the neutralizer tank concentration exceeds the specified LLD.

C. JUSTIFICATION FOR THE EMERGENCY CLASSIFICATION

The requested one time only Emergency Technical Specification change will allow Unit 1 to continue to operate to allow for cleanup activities of radioactive liquids resulting from a primary to secondary leak. The Emergency Technical Specification change request is necessary to avoid derating and shutdown of the unit. In order to achieve the above, a suspension of pre-noticing requirements of 10 CFR Part 50.91 is required and expeditious granting of the proposed one time only change be effected. We have used every effort to try and avoid an emergency request, however, our latest calculations show that the decontamination activities will be at it's limits by the morning of March 24, 1987.

1. The first part of the report is a summary of the work done during the year. It is divided into two main sections: a general summary and a summary of the work done in each of the four departments.

2. The second part of the report is a detailed account of the work done in each of the four departments. It is divided into four sections: the first section is a summary of the work done in the first department, the second section is a summary of the work done in the second department, the third section is a summary of the work done in the third department, and the fourth section is a summary of the work done in the fourth department.

3. The third part of the report is a summary of the work done during the year. It is divided into two main sections: a general summary and a summary of the work done in each of the four departments.

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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 to allow continued operation of the unit while the concentration of radioactive material discharged from secondary system liquid waste to the onsite evaporation ponds is above the lower limit of detectability but within the limits of 10 CFR Part 20, Appendix B, Table II. This allows for cleanup (decontamination) activities of radioactive liquids resulting from a primary to secondary leak, while maintaining the unit in an operating condition. 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, effect or provide any physical changes to the facility. This proposed change allows for discharge of radioactive liquids which have been generated during normal processing/regeneration of condensate polisher resins. The small amounts ($<2 \times 10^{-6}$ uCi/ml) of total activity present in regeneration wastes which will be discharged into the onsite evaporation ponds are within the limits of 10 CFR Part 20, Appendix B, Table II. 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.

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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 basis of the plant. The existing limits for concentrations of radioactive material discharged from secondary system liquid waste to the onsite evaporation ponds will remain at 5×10^{-7} u Ci/ml for principal gamma emitters. However, releases of principal gamma emitters with half lives less than 75 days may be allowed to exceed 5×10^{-7} u Ci/ml but will be limited to 10 CFR 20, Appendix B, Table II concentrations for a period not to exceed 60 days. This will allow PVNGS to maintain a dose to the public of less than 500 mrem per year from accumulated particulates in the evaporation pond after the three units have been operating for 40 years. This is consistent with the design basis of the facility. For these reasons, it has been determined that the change does not involve a significant reduction in the margin of safety.

2. The proposed change 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 which in some way may reduce the safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system, (Example VI).

E. SAFETY ANALYSIS OF THE PROPOSED CHANGE REQUEST

The proposed Technical Specification change will not increase the probability or occurrence of the consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR. This change will not effect the operation of the facility, it will increase the allowable limits of concentration for discharge into the evaporation ponds from secondary system liquid waste.

The proposed Technical Specification change will not create the possibility for an accident or malfunction of equipment of a different type than any evaluated previously in the FSAR. No physical changes are being made to the facility and this change is within the previously evaluated design and operation of the facility. The proposed Technical Specification change will not reduce the margin of safety as defined in the basis for any Technical Specification. The basis for specification 3.11.1.1 uses the guidelines of 10 CFR 20 which, as noted by the footnote to the specification, will be the limiting factor for principal gamma emitters with half lives less than 75 days. This provides assurance that the resulting total body annual exposure from ground contamination to a member of the public at the nearest exclusion area boundary will be within the limits.

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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 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 PAGE

(see page 3/4 11-1)