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SUBJECT: Application for amends to Licenses NPF-41, NPF-51 & NPF-65,
 changing surveillance requirements of Tech Specs Section
 3/4.4.3, concerning pressurizer heater capacity.

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April 6, 1987
161-00129-JGH/PGN

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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 (License NPF-65)
Technical Specification Amendment - Section 3/4.4.3
File: 87-F-005-419.05; 87-A-056-026

Dear Sirs:

Attached please find proposed changes to the PVNGS Units 1, 2 and 3 Technical Specifications. The proposed changes are to the surveillance requirements of section 3/4.4.3, concerning the pressurizer heater capacity.

Enclosed, with the 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 Evaluation for the Amendment Request.
- F. Environmental Impact Consideration Determination.
- G. Marked-up Technical Specification Change Pages.

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 being forwarded to the USNRC License Fee Management Coordinator.

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If you have any questions, please call W. F. Quinn, at (602) 371-4087.

Very truly yours,



J. G. Haynes
Vice President
Nuclear Production

JGH/PGN/1s
Attachments

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ATTACHMENT

A. DESCRIPTION OF THE TECHNICAL SPECIFICATION AMENDMENT REQUEST

Technical Specification 3.4.3.1 currently requires at least two groups of pressurizer heaters capable of being powered from Class 1E buses, each having a nominal capacity of at least 150 kW. The proposed amendment would change this requirement to two groups of heaters having a minimum capacity of 125 kW. The surveillance requirements are revised accordingly.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

The purpose of this technical specification requiring a minimum number of pressurizer heaters be operable is to enhance the capability to control Reactor Coolant System pressure and establish and maintain natural circulation.

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

Technical Specification surveillance requirement 4.4.3.1.2 states that the capacity of the required groups of pressurizer heaters shall be verified to be at least 150 kW at least once per 92 days. The required pressurizer heaters are powered from a class 1E bus and have a nominal rating of 150 kW. During surveillance testing the pressurizer heaters may fail the surveillance criteria because of normal variations of the bus voltage. This Technical Specification change proposes reducing the required measured capacity of the pressurizer heaters to allow for variations in the bus voltage.

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 since the pressurizer heaters are not classified as safety grade at PVNGS and no

credit is taken for their capacity in any of the accidents previously evaluated. Therefore, the probability or consequences of an accident previously evaluated will not be significantly 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. This change does not involve a change to plant equipment, therefore, the possibility of a new or different kind of accident from any accident previously analyzed will not be created.

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

The proposed change will not involve a significant reduction in a margin of safety since the amount of pressurizer heaters capacity to be verified in the revised surveillance requirement is greater than the capacity required to satisfy the basis for the pressurizer heater Technical Specification. In addition, the measured value of pressurizer heat loss is 118 kW, so the revised pressurizer heater capacity requirement of 125 kW is sufficient to offset pressurizer heat loss. Therefore, a significant reduction in a margin of safety is not involved.

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

(ix) Other: A change to a surveillance requirement that was based on an analytical value, to reflect normal variations in the bus voltage that power the equipment being tested.

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 pressurizer heaters are not classified as safety grade at PVNGS and no credit is taken for their capacity in any of the accidents previously evaluated. Therefore, operation of the facility in accordance with the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

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 change does not involve a change to plant equipment, therefore, operation of the facility in accordance with the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed Technical Specification amendment will not reduce a margin of safety since the pressurizer heater capacity to be verified in the revised surveillance requirement is greater than the capacity required to satisfy the basis of the pressurizer heater Technical Specification. In addition, the measured value of pressurizer heat loss is 118 kW, so the revised pressurizer heater capacity requirement of 125 kW is sufficient to offset pressurizer heat loss. Therefore, the margin of safety is not reduced.

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed change request does not involve an unreviewed environmental question because operation of PVNGS Units 1, 2 and 3, 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 PAGES:

Limiting Conditions for Operation and Surveillance Requirements:

3/4 4-9

