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 VAN BRUNT, E.E. Arizona Nuclear Power Project (formerly Arizona Public Serv  
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SUBJECT: Application for amends to Licenses NPF-41, NPF-51 & NPF-65,  
 correcting action statement on Tech Spec Table 3.3-1.

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## Arizona Nuclear Power Project

P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

161-00828-EEVB/LJM  
February 26, 1988

Docket Nos. STN 50-528/529/530

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

ATTN: Document Control Desk

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2 and 3  
Technical Specification Amendment - Section Table 3.3-1  
File: 88-F-005-419.05; 88-B-056-026; 88-C-056-026; 88-D-056-026

Attached please find the proposed changes to the PVNGS Units 1, 2 and 3 Technical Specifications. The change corrects the referenced ACTION statement of the Excore Log Power Channels of Table 3.3-1. We request 30 days to implement the change after the date the change becomes effective.

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.

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

In accordance with the requirements of 10CFR170.12(c), the license amendment application fee of \$150.00 has been forwarded to the Facilities Program Coordinator of LFMB.

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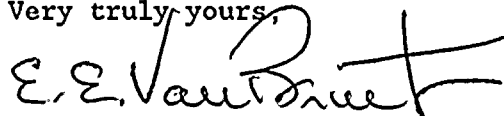


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February 26, 1988

If you have any questions, please call A. C. Rogers at (602) 371-4041.

Very truly yours,



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

EEVB/LJM/ljs  
Attachments

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



## Attachment

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

The proposed amendment replaces the ACTION statement of Technical Specification (T.S.) Table 3.3-1 section I.B.2a, Startup Logarithmic Power Level-High Channels. Presently the ACTION statement is #8, the proposed change replaces the ACTION statement with statements #2 and #3.

### B. PURPOSE OF THE TECHNICAL SPECIFICATION

T.S. Table 3.3-1 ensures that (1) the associated Engineered Safety Features actuation action and/or reactor trip will be initiated when the parameter monitored by each channel or combination thereof reaches its setpoint, (2) the specified coincidence logic is maintained, (3) sufficient redundancy is maintained to permit a channel to be out of service for testing or maintenance, and (4) sufficient system functional capability is available from diverse parameters. The purpose of the High Logarithmic Power channels is to assure the integrity of the fuel cladding and RCS boundary in the event dilution of the soluble boron concentration or uncontrolled withdrawal of CEAS occurs.

### C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

Table 3.3-1 requires that with less than 3 log channel detectors operating, an inoperable channel must be restored to OPERABLE status within 48 hours or open an affected reactor trip breaker within the next hour (ACTION #8). However, the log power bistables input into the RPS matrix logic and are not assigned to any particular reactor trip breaker therefore determining which reactor trip breaker is the affected one becomes very difficult. Also, if the operator were to perform ACTION #8 when 1 less than the minimum operable log channels are operable the result would be that a 2 out of 2 trip logic would occur. Since this is an unacceptable condition in the safety analysis and does not satisfy single failure requirements the action statement should be changed to ACTION #2 and #3, which requires 1 channel to be by passed and one tripped thus establishing a 1 out of 2 trip logic. This logic is consistent with other similar RPS input parameters and is consistent with the safety analysis.

### 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 CFR50.92. 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:



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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. The present T.S. would place the plant in a configuration which has not been defined by the safety analysis. Changing the action statement to the more appropriate actions of #2 and #3 would establish a 1 out of 2 trip logic and would be consistent with the assumptions of the safety analysis thus maintaining the same probability or consequences of an accident as was originally evaluated.

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 in the FSAR. The present T.S. would place the plant in a configuration which has not been defined by the safety analysis. Changing the action statement to the more appropriate actions of #2 and #3 would establish a 1 out of 2 trip logic and would be consistent with the assumptions made in the safety analysis thus not introducing any new or different kinds of accidents.

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. The present T.S. would place the plant in a configuration which has not been defined by the safety analysis. Changing the action statement to the more appropriate actions of #2 and #3 would establish a 1 out of 2 trip logic and would be consistent with the assumptions of the safety analysis thus maintaining the same margin of safety as was originally evaluated.

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:

- (i) A purely administrative change to technical specifications for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.

#### 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 does not modify or replace equipment or components important to safety. The change corrects an inappropriate use of an action statement.



The proposed Technical Specification amendment will not create the possibility for an accident or malfunction of a different type than previously evaluated in the FSAR. The present T.S. would place the plant in a configuration which has not been defined by the safety analysis. Changing the action statement to the more appropriate actions of #2 and #3 would establish a 1 out of 2 trip logic and would be consistent with the assumptions made in the safety analysis thus not introducing any new or different kinds of accidents.

The proposed Technical Specifications amendment will not reduce the margin of safety as defined in the bases for the Technical Specifications. The present T.S. would place the plant in a configuration which has not been defined by the safety analysis. Changing the action statement to the more appropriate actions of #2 and #3 would establish a 1 out 2 trip logic and would be consistent with the assumptions of the safety analysis thus maintaining the same margin of safety as was originally evaluated.

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; 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 SPECIFICATIONS CHANGE PAGES

Limiting Conditions For Operation and Surveillance Requirements:  
3/4 3-3

