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SUBJECT: Application for amends to Licenses NPF-41,NPF-51 & NPF-74, changing Tech Spec Table 3.6-1.

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161-01012-EEVB/LJM
May 9, 1988

Docket Nos. STN 50-528/529/530

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

Attn: Document Control Desk

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Technical Specification Amendment - Containment Isolation Valves
File: 88-005-419.05; 88-056-026

Attached, please find proposed changes to the PVNGS Units 1, 2 and 3 Technical Specifications Table 3.6-1. This change reduces the maximum actuation time of the containment isolation valves, which isolate the air radioactivity monitor, from 12 seconds to 1 second.

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.

It is requested that 30 days be allowed to implement the change after the date the change becomes effective.

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

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In accordance with the requirements of 10 CFR 170.12(c), the license amendment application fee of $150.00 has been forwarded to the U.S. NRC Document Control Desk.

If you have questions please contact A. C. Rogers at (602) 371-4087.

Very truly yours,

E. E. Van Brunt

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

EEVB/LJM/dlm

cc: J. B. Martin (w/a)
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T. J. Polich (w/a)
C. F. Tedford (w/a)

ATTACHMENT

A. DESCRIPTION OF THE TECHNICAL SPECIFICATION AMENDMENT REQUEST

The proposed amendment would change Technical Specification (T.S.) Table 3.6-1, Containment Isolation Valves (HCB-UV 044, 045, 046 and 047) maximum actuation times from 12 seconds to 1 second.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

The operability of the containment automatic isolation valves ensure that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment and consistent with the requirements of GDC 54 through GDC 57 of Appendix A to 10CFR Part 50 and with the assumptions used in the analyses for a LOCA.

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

By allowing the isolation valves to close in 12 seconds, the air radioactivity monitor could experience a containment pressure of up to 40 lbs. Since the monitor is designated to only sustain pressures of up to 10 lbs, the isolation valves should be required to have a faster actuation time. In support of the monitors design limits and per FSAR figure 6.2.1-2, Containment Pressure and Temperature Response, Double-Ended Discharge Leg Slot Break, Minimum ECCS, the actuation time of the valves should be changed to 1 second.

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 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 of consequences of an accident previously evaluated; of (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; of (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. The change corrects a situation where possible damage to the Radiation monitor could occur. By requiring the valves to close in 1 second instead of 12 seconds and thus maintaining the design limits of the radiation monitor, the assumptions made for the loss of containment integrity are maintained. Therefore, there is no change to the probability or consequences of an accident.

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 of different kind of accident from any accident previously evaluated because the proposed change does not alter the configuration of the plant or the way in which it is operated. The change corrects the T. S.

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. By correcting the actuation time the assumptions made in the bases are maintained and therefore, the margin of safety remains the same.

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

   (2) A purely administrative change to Technical Specification: for example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature.

E. <u>SAFETY EVALUATION FOR THE AMENDMENT REQUEST</u>

The proposed Technical Specification amendment will not increase the probability of occurrence of the the consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR. The proposed change does not alter the configuration of the isolation valves or their operation. They have been tested and have always passed the 1 second actuation time. The change merely corrects the T.S. to reflect what the actuation time should be, insure the integrity of containment, and protect the radiation monitor.

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 does not alter the configuration of the plant or the way in which it operates. The change corrects an error in the T.S. By allowing the isolation valves to close in 12 seconds, integrity to containment could be breached due to damage to the radiation monitor. With the change in place, the possibility of damage to the radiation monitor is reduced to a value which would not affect the assumptions in the analyses for a LOCA.

The proposed Technical Specification amendment will not reduce the margin of safety as defined in the bases for the Technical Specifications. By correcting the actuation time the assumptions made in the bases are maintained and therefore, the margin of safety remains the same.

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed change request does not involve a 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 of power levels; or

3. Result in matters not previously reviewed in the licensing basis for PVNGS which may have a significantly environmental impact.

G. MARKED-UP TECHNICAL SPECIFICATION CHANGE PAGES

Limiting conditions for operation and surveillance requirements.

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