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ACCESSION NBR:8808050033 DOC.DATE: 88/07/25 NOTARIZED: NO DOCKET #
FACIL:STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528
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SUBJECT: Application for amend to License NPF-41,changing Tech Specs Section 3.3.2,Table 3.3-5 re ESF response times.

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161-01190-EEVB/JRP
July 25, 1988

Docket No. STN 50-528

Document Control Desk
U. S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D. C. 20555

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Technical Specification Amendment Request
Radiation Detector Response Time Testing
File: 88-F-005-419.05; 88-056-026

This letter is provided to request an amendment to the PVNGS Unit 1 Technical Specifications Section 3.3.2, Table 3.3-5; Engineered Safety Features Response Times. The request consists of the following proposed changes. Table 3.3-5 lists the engineered safety features response times with both the initiating signal and function along with the response time in seconds. The proposed change is to item number 10, Control Room Essential Filtration Actuation response time of $\leq$ 180*/ $\leq$ 180**. The second ($\leq$) listed is a typographical error, it should be deleted. The second proposed change is to add a double pound sign (##) to the existing (180**), this would clarify the response time testing. With the addition of the double pound sign (##) a Table Notation is to be added stating: ## Radiation detectors are exempt from response time testing. The response time of the radiation signal portion of the channel shall be measured from the detector output or from the input of first electric component in channel to closure of dampers M-HJA-M01, M-HJA-M52, M-HJB-M01 and M-HJB-M55.

The reasoning behind not simulating the radiation signal is based on IEEE Standard 338-1977, which states in part that "In general, incident environmental conditions such as seismic events, radiation fields, extreme pressures, temperatures, and moisture conditions are covered by design qualification and need not be simulated."

The third change consists of adding a single and a double asterisk to the footnote, it should read $\leq$ 8.6*/8.6** seconds. The asterisks were inadvertently omitted during proof and review typing.

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Enclosed within this amendment request are:

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

At this time we would like to request that this proposed Technical Specification change be expedited as quickly as possible based on the fact that the changes presented herewith, were previously discussed with and agreed to by your staff during the PVNGS Unit 2 and 3 Technical Specifications review process and have been incorporated into the PVNGS Unit 2 and 3 operating license. Upon your approval, we hereby request a 45 day implementation period to allow appropriate procedure transition.

Pursuant to 10CFR50.91(b)(1), and by copy of this letter and attachment, we have notified the Arizona Radiation Regulatory Agency of this request for a Technical Specification change. In accordance with 10CFR170.12(c), the License Amendment fee of $150 is enclosed.

If you have any questions or concerns, please call.

Very truly yours,

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

EEVB/JRP/jle
Attachments

cc: G. W. Knighton (w/a)
M. J. Davis (w/a)
J. B. Martin (w/a)
T. J. Polich (w/a)
C. E. Tedford (w/a)

ATTACHMENT

A. DESCRIPTION OF AMENDMENT REQUEST

The proposed amendment request would change Technical Specification Table 3.3-5' ESF Response Times, Item 10 and Table Notations, to add a double pound sign (##) and the statement, "Radiation detectors are exempt from response time testing. The response time of the radiation signal portion of the channel shall be measured from the detector output or from the input of first electronic component in channel to closure of dampers M-HJA-M01, M-HJA-M52, M-HJB-M01 and M-HJB-M55." The double pound sign (##) would also be placed beside the response times of item 10. And the second ($\leq$) sign is to be deleted because it is a typographical error.

The third change consists of adding a single and a double asterisk to the footnote, it should read $\leq$ 8.6*/8.6** seconds. The asterisks were inadvertently omitted during proof and review typing.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

The operability of the radiation monitoring channels ensures that: (1) the radiation levels are continually measured in the areas served by individual channels and (2) the alarm or automatic action is initiated when the radiation level trip setpoint is exceeded. The measurement of response time at the specified frequencies provides assurance that the protective and ESF action function associated with each channel is completed within the time limit assumed in the safety analyses.

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

IEEE Standard 338-1977 lists the criteria for the periodic testing of safety systems. Section 5(1) states that the design shall provide the capability for periodic testing which simulates, as closely as practicable, the performance that is required of the system in the event of a design basis event. It also goes on to say that radiation fields are covered by design qualification and need not be simulated.

D. BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION

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 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 follows:

Standard 1 - Involves 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 clarify that radiation detectors (monitors) XJ-SQA-RU-29 and XJ-SQB-RU-30 are not to be included in response time measurements for dampers M-HJA-M01, M-HJA-M52, M-HJB-M01 and M-HJB-M55. These monitors have undergone extensive testing in the vendor shop and have demonstrated to respond within 0.5 seconds under worst case accident conditions. Based on this information, the proposed change will 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. The change is for clarification and consistency. It clarifies that the response time of the radiation signal portion of the channel shall be measured from the detector output or from the input of first electronic component in channel to closure of dampers M-HJA-M01, M-HJA-M52, M-HJB-M01, M-HJB-M55 and is consistent with the reactor protective instrumentation response time testing.

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

The proposed 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 response time of the radiation signal portion of the channel will be measured using the surveillance requirements specified for these systems thus assuring that the overall system functional capability is maintained comparable to the original design standards. Therefore, this change does not involve a significant reduction in a 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 is an administrative change to the Technical Specifications: for example, this change is to achieve consistency throughout the Technical Specifications and also the correction of an error. (Example i)

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. The change is for clarification and consistency. It clarifies that the response time of the radiation signal portion of the channel shall be measured from the detector output or from the input of first electronic component in channel to closure of dampers M-HJA-M01, M-HJA-M52, M-HJB-M01, M-HJB-M55 and is also consistent with Table 3.3-2 for Reactor Protective Instrumentation Response Time testing.

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 in that response time testing from a manual trip of RMS is still measured.

The proposed Technical Specification change will not reduce the margin of safety as defined in the basis for any Technical Specification in that the change is consistent with the response time for neutron detectors as listed in Table 3.3-2 for Reactor Protective Instrumentation Response Times.

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 attached page)