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AUTH.NAME AUTHOR AFFILIATION  
KARNER,D.B. Arizona Nuclear Power Project (formerly Arizona Public Serv  
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SUBJECT: Application for amends to Licenses NPF-41,NPF-51 & NPF-74,  
revising senior reactor operator license requirements.

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## Arizona Nuclear Power Project

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

161-01292-DBK/RAB  
September 6, 1988

Docket Nos. STN 50-528/529/530

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

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Technical Specification Amendment Request  
Section 6.3.1  
File: 88-F-005-419.05; 88-A-056-026

This letter is provided to request an amendment to the PVNGS 1, 2, and 3 Technical Specifications Section 6.3.1, Unit Staff Qualifications. The proposed change would modify the Senior Reactor Operator license requirements for the Operations Manager.

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 Pages

Pursuant to 10CFR50.59(b)(1), and by copy of this letter and attachments, 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 \$150.00 is enclosed.

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

Very truly yours,



D. B. Karner  
Executive Vice President

DBK/RAB/dlm

Attachments

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

1622K/0057K

161-01292-DBK/RAB  
September 6, 1988

bcc: J. G. Haynes  
J. M. Allen  
W. E. Ide  
O. J. Zeringue  
J. E. Kirby  
W. F. Quinn  
A. C. Rogers  
R. A. Bernier  
R. J. Adney

## ATTACHMENT 1

### A. Description of Amendment Request

The proposed amendment request would modify the Senior Reactor Operator (SRO) license requirements for the Operations Manager by requiring that either he or the Operations Supervisor hold a valid SRO license. The proposed change would also require that the individual who holds the SRO license would direct the licensed activities of the licensed operators. The requested change takes exception to ANS 3.1-1978, Section 4.2.2 which states the qualification requirements for the Operations Manager.

### B. Purpose of the Technical Specification

Specification 6.3.1 ensures that personnel who operate a nuclear power plant meet or exceed minimum qualifications as defined in a national standard. Specifically, Section 4.2.2 of ANS 3.1-1978 ensures compliance with 10CFR50.54(1) which requires that the licensed activities of licensed operators shall be directed by an individual who holds an SRO license.

### C. Need for the Technical Specification Amendment

The administrative duties associated with the Operations Manager position consist of many tasks not associated with the direction of the licensed activities of the licensed operators. ANPP is providing an Operations Supervisor to assist the Operations Managers in each unit to fulfill all of the responsibilities of the position (see Attachment 2). This proposed change would allow one of the individuals to be exempt from the requirement to have an SRO license, but still maintain an individual who meets the requirements to comply with 10CFR50.54(1). This proposed change would enhance safe operation of the plants since more management attention could be focused on plant activities.

### 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 change allows one of two individuals in plant management to be exempt from the SRO license requirement, while the other would fulfill the license requirement for the Operations Manager function and direct licensed activities of the licensed operators. Since 10CFR50.54(1) will still be complied with, the proposed change meets the criteria of Standard 1 as stated above.

Standard 2 - Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed change does not vary, effect, or provide any physical changes to the facility. The change is administrative in nature and will allow for the same level of direction as before, i.e., a person with an SRO license directing licensed activities, while allowing for more management involvement in plant operation. Therefore, the change meets the criteria of Standard 2 as stated above.

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 because it does not affect the design basis of the plant. The proposed change will allow for more management interaction in plant operation since only one individual will be required to maintain a SRO license while still providing the proper direction of licensed activities of licensed operators. The increased management interaction will provide a better oversight of plant operations and will add to the safe operation of the plant. Therefore, the proposed change meets the criteria of Standard 3 as stated above.

2. The proposed change matches one of the examples given in 51FR7751 of amendments that do not include a significant hazards consideration. Specifically, the proposed amendment is a change which is an administrative change to the Technical Specifications.

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. The change will not make changes to the facility; the change provides an alternate method of fulfilling the SRO license requirement for the Operations Manager function.

The proposed Technical Specification change will not create the possibility of 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; the change is administrative in nature in that the qualification requirements for the Operations Manager function are being modified while maintaining proper direction over licensed activities of licensed operators.

The proposed Technical Specification change will not reduce the margin of safety as defined in the basis for any Technical Specification. The change affects the Administrative Controls of the Technical Specifications only.

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 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 pages for each unit)

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