

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8910190148 DOC. DATE: 89/10/10 NOTARIZED: NO DOCKET #
 FACIL: STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528
 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530

AUTH. NAME AUTHOR AFFILIATION
 CONWAY, W.F. Arizona Public Service Co. (formerly Arizona Nuclear Power
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to Licenses NPF-41, NPF-51 & NPF-74,
 revising Tech Spec Section 3.3.2, re ESFAS instrumentation.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6+9
 TITLE: OR Submittal: General Distribution

NOTES: 05000528 /
 Standardized plant. 05000529 A
 Standardized plant. 05000530 D

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD5 LA	1 1	PD5 PD	1 1
CHAN, T	5 5	DAVIS, M.	5 5
INTERNAL: ACRS	6 6	NRR/DEST/ADS 7E	1 1
NRR/DEST/ESB 8D	1 1	NRR/DEST/ICSB	1 1
NRR/DEST/MTB 9H	1 1	NRR/DEST/RSB 8E	1 1
NRR/DOEA/TSB 11	1 1	NUDOCS-ABSTRACT	1 1
OC/LEMB	1 0	OGC/HDS1	1 0
<u>REG FILE</u> 01	1 1	RES/DSIR/EIB	1 1
EXTERNAL: LPDR	1 1	NRC PDR	1 1
NSIC	1 1		

NOTES: 1 1

opp 2

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 33 ENCL 31

R
I
D
S
/
A
D
D
S



Arizona Public Service Company

P.O. BOX 53999 • PHOENIX, ARIZONA 85072-3999

WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

161-02472-WFC/JRP
October 10, 1989

Docket Nos. STN 50-528/529/530

Document Control Desk
U. S. Nuclear Regulatory Commission
Mail Station Pl-37
Washington, D.C. 20555

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Request for a Technical Specification Change -
ESFAS Response Time Testing
File: 89-F-005-419.05; 89-A-056-026

The purpose of this letter is to request a change to the Technical Specification Section 3.3.2 (Engineered Safety Features Actuation System (ESFAS) Instrumentation) for PVNGS Units 1, 2, and 3. The proposed change would exempt the turbine-driven Auxiliary Feedwater (AFW) pump from ESFAS response time testing until Mode 3 conditions are reached. This exemption is similar to the exemption already provided under Limiting Condition for Operation (LCO) 3.7.1.2. The LCO 3.7.1.2 exemption allows for entry into Mode 3 to perform the ASME Section XI operability test on the turbine-driven AFW pump. The proposed change is necessary because the appropriate plant conditions (i.e., steam pressure) for testing of the pump are not achieved until Mode 3.

The following information is included within this amendment request package:

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

Pursuant to 10CFR50.91(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. At this time, we are requesting that this amendment become effective within 45 days of issuance.

8910190148 891010
PDR ADOCK 05000528
P PDC

A001
11

If you have any additional questions on this matter, please call.


W. F. Conway

WFC/JRP/dlm

Attachment

cc: G. W. Knighton (all w/a)
T. L. Chan
M. J. Davis
J. B. Martin
T. J. Polich
Director - ARRA



ATTACHMENT

A. DESCRIPTION OF THE PROPOSED CHANGE

This proposed change will exclude the turbine-driven Auxiliary Feedwater (AFW) pump from ESFAS response time testing until Mode 3 conditions are reached. This change is consistent with Limiting Condition for Operation (LCO) 3.7.1.2 which provides an exemption from Specification 4.0.4 for the turbine-driven AFW pump for entry into Mode 3. LCO 3.7.1.2 allows entry into Mode 3 so that the ASME Section XI operability test for the pump can be conducted under the appropriate plant conditions. Adequate steam pressure must be achieved in the secondary plant before the pump can be properly tested. In summary, this change will provide an exemption from Specification 4.0.4 for LCO 3.3.2 to allow for entry into Mode 3 without having completed the ESFAS response time testing for the turbine-driven AFW pump.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

The periodic testing of ESFAS response times provides assurance that the protective actions and ESF functions are completed within the time limits assumed in the safety analyses. The turbine-driven AFW pump is automatically started in response to a low level signal in either steam generator. The ESFAS response time testing ensures that this ESF function can be accomplished in accordance with the safety analysis assumptions.

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

This change will provide for consistency between the different Technical Specifications. LCO 3.7.1.2 recognizes that the turbine-driven AFW pump cannot be properly tested until Mode 3. Therefore, an exemption from Specification 4.0.4 is provided to allow for entry into Mode 3 at which point the operability testing can be conducted. This allowance does not currently exist for LCO 3.3.2 concerning ESFAS response time testing. Extending the 4.0.4 exemption to LCO 3.3.2 will be consistent with the allowance already provided in LCO 3.7.1.2 and will eliminate a potential source of confusion in the Technical Specifications.

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 request follows:

Standard 1 - Involve a significant increase in the probability or consequences of an accident previously evaluated.

Basis - The proposed Technical Specification change will not result in a significant increase in the probability or consequences of any accidents previously evaluated. The change involves the addition of an exemption from Specification 4.0.4 for ESFAS response time testing of the turbine-driven AFW pump. This would allow for entry into Mode 3 prior to performing the response time testing. In Mode 3, the proper plant conditions exist for performing the testing of this pump. The proposed change does not impact the probability of occurrence of any initiating event for previously analyzed accidents. Additionally, the proposed change will provide consistency between the different Technical Specifications. LCO 3.7.1.2 currently provides a 4.0.4 exemption which allows the unit to enter Mode 3 prior to establishing operability of this pump. Therefore, this change will not affect the current operability requirements for the turbine-driven AFW pump.

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

Basis - The proposed change will not create the possibility of a new or different kind of accident from any accident previously analyzed. No physical modifications are being made to the existing plant equipment. The turbine-driven AFW pump cannot be properly tested until the appropriate conditions are reached in the secondary plant. This occurs in Mode 3. This testing limitation is already incorporated into LCO 3.7.1.2 but was not incorporated into LCO 3.3.2. Therefore, this change will provide consistency between the LCOs and incorporate a previously recognized testing limitation.

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

Basis - The proposed change will not involve a significant reduction in a margin of safety. The change extends an allowance that is already provided for in the Technical Specifications. Per LCO 3.7.1.2, operability of the turbine-driven AFW pump must be established prior to Mode 2 entry. This same operability requirement should be applied to the ESFAS response time testing requirements of LCO 3.3.2.

2. The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (51FR7751) of amendments that are considered least likely to involve a significant hazards consideration. The proposed change matches example (i) in that it is a change to achieve consistency



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

1

throughout the Technical Specifications. The testing limitation of the turbine-driven AFW pump has already been recognized in one section of the Technical Specifications. LCO 3.7.1.2 provides a 4.0.4 exemption to allow entry into Mode 3 before operability of the pump is established. This proposed change extends the 4.0.4 exemption to ESFAS response time testing (LCO 3.3.2). This provides for consistency throughout the Technical Specifications.

E. SAFETY EVALUATION FOR THE PROPOSED CHANGE

This proposed Technical Specification change will not increase the probability or consequences of any accidents previously evaluated in the FSAR. This proposed change affects the turbine-driven AFW pump. The pump is currently required to be operable prior to Mode 2 entry (per LCO 3.7.1.2). LCO 3.7.1.2 provides an exemption from Specification 4.0.4 which allows the unit to enter Mode 3 without establishing operability of this pump.

The proposed change would only provide clarification to the Technical Specifications by formally extending the 4.0.4 exemption to ESFAS response time testing (LCO 3.3.2) for the turbine-driven AFW pump. This will provide for consistency between the different specifications. The response time testing provisions for the turbine-driven AFW pump have no impact on the probability of occurrence of any previously analyzed accidents. Additionally, the consequences of previously analyzed accidents will not be increased since the Technical Specifications already allow for this exemption.

This proposed Technical Specification change will not increase the probability or consequences of a malfunction of equipment important to safety. The Technical Specifications already allow for inoperability of the turbine-driven AFW pump until operability is established in Mode 3 when proper steam conditions exist to perform the testing. This proposed change provides consistency between the different specifications concerning operability of this pump.

This proposed change will not reduce the margin of safety as defined in the basis for any Technical Specification. LCO 3.7.1.2 already grants the turbine-driven AFW pump a 4.0.4 exemption to allow entry into Mode 3 without performing an operability test. This proposed change will only extend this 4.0.4 exemption to LCO 3.3.2 to ensure consistency between the different specifications.

E. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed Technical Specifications 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 (ASLB), Supplements to the FES, Environmental Impact appraisals, or in any decisions of the ASLB; or



2. Result is 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

Enclosed are revised pages 3/4 3-29 and 3/4 3-30 of the PVNGS Units 1, 2, and 3 Technical Specifications.

