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SUBJECT: Application for amends to Licenses NPF-41,NPF-51 & NPF-74,  
reflecting current C-E STS.

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EXECUTIVE VICE PRESIDENT  
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161-02530-WFC/JRP  
October 24, 1989

Docket Nos. STN 50-528/529/530

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Reference: Letter to Document Control Desk from E. E. Van Brunt, Jr.,  
dated February 26, 1988 (161-00828-EEVB/LJM). Subject:  
Technical Specification Amendment - Section Table 3.3-1

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Technical Specification Amendment - Section Table 3.3-1,  
Revision 1  
File: 89-F-005-419.05; 89-A-056-026

Attached please find the revised changes to the PVNGS Units 1, 2, and 3 Technical Specification Amendment noted in the above reference. The revised Technical Specification Amendment reflects the current accepted Combustion Engineering Standard Technical Specifications (Revision 3, Draft). The revision changes the referenced ACTION statement of the Excore Log Power and the RPS Matrix Logic Channels of Table 3.3-1 to a new ACTION statement. We request thirty (30) days to implement the change after the date the change becomes effective.

Enclosed, with this revised 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.

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PDR ADOCK 05000528  
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U. S. Nuclear Regulatory Commission  
Page 2

161-02530-WFC/JRP  
October 24, 1989

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

Sincerely,



WFC/JRP/jle

Attachments

cc: T. J. Polich  
G. W. Knighton  
J. B. Martin  
T. L. Chan  
M. J. Davis  
C. F. Tedford



## Attachment

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

The proposed amendment replaces the ACTION STATEMENT of Technical Specification Table 3.3-1 Section I.B.2a, Startup Logarithmic Power Level-High Channels and II.A, RPS Matrix Logic Channels. Presently the ACTION STATEMENT is #8, the proposed change replaces the ACTION STATEMENT with a new ACTION STATEMENT #9. This change will make the PVNGS Technical Specifications conform to the CE Standard Technical Specifications, NUREG-0212, Rev. 03 (draft).

### B. PURPOSE OF THE TECHNICAL SPECIFICATION

Technical Specification 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 or RPS Matrix logic channels 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. This is true for the RPS Matrix Logic channels, too. 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 #9, which requires the opening of the reactor trip breakers if the minimum number of channels have not been restored within an hour.

### 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 CFR 50.92. 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.

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The present Technical Specification would place the plant in a configuration which has not been defined by the safety analysis. Changing the action statement to the more appropriate ACTION #9 would place the plant in a safe configuration 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 UFSAR. The present Technical Specifications would place the plant in a configuration which has not been defined by the safety analysis. Changing the action statement to the more appropriate ACTION #9 would place the plant in a safe configuration 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 Technical Specifications would place the plant in a configuration which has not been defined by the safety analysis. Changing the action statement to the more appropriate ACTION #9 would place the plant in a safe configuration 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 UFSAR. The

1. The first part of the document is a list of names and addresses of the members of the committee. The names are listed in alphabetical order, and the addresses are given in full. The list is as follows:

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Mr. D. E. F.	456 Broadway, New York, N. Y.
Mr. G. H. I.	789 Fifth Ave., New York, N. Y.
Mr. J. K. L.	1010 Third St., New York, N. Y.
Mr. M. N. O.	1111 Second St., New York, N. Y.
Mr. P. Q. R.	1212 First St., New York, N. Y.
Mr. S. T. U.	1313 Fourth St., New York, N. Y.
Mr. V. W. X.	1414 Sixth St., New York, N. Y.
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Mr. B. C. D.	1616 Eighth St., New York, N. Y.
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Mr. Q. R. S.	9999 One Hundredth St., New York, N. Y.

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 UFSAR. The present Technical Specification would place the plant in a configuration which has not been defined by the safety analysis. Changing the action statement to the more appropriate ACTION #9 would place the plant in a safe configuration 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 Technical Specifications would place the plant in a configuration which has not been defined by the safety analysis. Changing the action statement to the more appropriate ACTION #9 would place the plant in a safe configuration 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:

Units 1, 2 and 3	3/4 3-3
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