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SUBJECT: Application for amends to Licenses NPF-41,NPF-51 & NPF-74, proposing to remove 3.25 limit on TS Section 4.0.2.

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

161-02935-WFC/JST
March 8, 1990

Docket Nos. STN 50-528/529/530

Document Control Desk
U. S. Nuclear Regulatory Commission
Mail Station P1-37
Washington, D. C. 20555

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Proposed Technical Specification Amendment to Section 4.0.2 to incorporate the recommendations of Generic Letter 89-14, "Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals"
File: 90-056-026

Arizona Public Service Company (APS) is requesting an amendment to Technical Specification 4.0.2 for PVNGS Units 1, 2, and 3. In accordance with the guidance provided in Generic Letter 89-14, we are proposing to remove the 3.25 limit on extending surveillance intervals in Specification 4.0.2.

Provided in the attachment to this letter for the proposed Technical Specification are the following:

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. Revised Technical Specification Change Pages

Pursuant to 10 CFR 50.91(b)(1), a copy of this request has been forwarded to the Arizona Radiation Regulatory Agency.

A001
1/1

If there are any questions concerning this request, please contact A. C. Rogers of my staff at (602) 340-4041.

Sincerely,

WFC/JST/jle

Attachments

cc: T. L. Chan (all w/attachments)
S. R. Peterson
J. B. Martin
D. H. Coe
A. C. Gehr
A. H. Gutterman
C. E. Tedford

161-02935-WFC/JST
March 7, 1990

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, W. F. Conway, represent that I am Executive Vice President - Nuclear, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority to do so, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true and correct.

W. F. Conway

Sworn To Before Me This 8th Day Of March, 1990.

Notary Public

My Commission Expires

7-22-93

Attachment

A. Description of Amendment Request

Technical Specification 4.0.2 will be changed to read as follows:

> 4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

This removes the 3.25 limit on the combined time interval for three consecutive surveillance intervals.

The Bases for Section 4.0.2 will also be changed to read as follows:

> Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with a 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through the surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

These changes are in accordance with the recommendations provided in Generic Letter 89-14.

B. Purpose of the Technical Specification

The purpose of Specification 4.0.2 is to permit surveillance intervals to be extended up to 25 percent of the specified interval. This extension facilitates the scheduling of surveillance activities and allows surveillances to be postponed when plant conditions are not suitable for conducting a surveillance, for example, under transient conditions or other ongoing surveillance or maintenance activities. Specification 4.0.2 also limits extending surveillances so that the combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval. The intent of the 3.25 limit is to preclude routine use of the provision for extending a surveillance interval by 25 percent.

C. Need for the Technical Specification Change

PVNGS operates on an 18-month fuel cycle and has numerous surveillances on 18-month surveillance intervals which must be performed during refueling outages. When unplanned outages occur during the fuel cycle the length of the fuel cycle is varied to provide the required core burnup. Typically the provision to extend the surveillance interval by 25 percent is sufficient to accommodate the variations in the length of the fuel cycle. However, the NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25 percent allowance for extending surveillances that are performed on a refueling outage basis.

As part of the line item improvements of Technical Specifications the NRC has issued Generic Letter 89-14 encouraging licensees to propose this change to the Technical Specifications. This change will remove an unnecessary restriction on extending surveillance requirements and will result in a benefit to safety when plant conditions are not conducive to the safe conduct of surveillance requirements. The removal of the 3.25 limit will provide greater flexibility in the use of the provision for extending surveillance intervals, reduce the administrative burden associated with its use, and have a positive effect on safety.

D. Basis for No Significant Hazards Consideration

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.
>
> Industry experience has demonstrated that the ability to extend surveillance intervals by 25 percent has a positive safety impact since it accommodates variations in fuel cycle length due to unplanned outages and eliminates forced shutdowns solely to perform refueling interval surveillances. The 25 percent surveillance interval extension also allows extension of a surveillance interval for a surveillance which is performed on a routine basis during power operation when plant conditions are unsuitable to its performance, such as during plant transients or when safety systems are out of service because of ongoing maintenance or surveillance activities. The additional restriction of not exceeding 3.25 times the surveillance interval for the performance of 3 consecutive

surveillances does not improve the safety of operation since this limitation could result in a forced shutdown solely to perform refueling interval surveillances with little or no safety benefit and result in surveillances being performed when plant conditions are unsuitable for their performance. Removal of the 3.25 limit surveillance interval improves safety by allowing flexibility in the scheduling of surveillances to ensure they are performed when plant conditions are suitable and allow for variations in fuel cycle length without a forced shutdown solely for the performance of surveillances (which in the vast majority of cases prove operability). Thus the proposed amendment does not result in an 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.

Removal of the 3.25 limitation on extending surveillance intervals reduces the possibility of a surveillance interval forcing a shutdown, or forcing the performance of a surveillance during unsuitable plant conditions. This produces a positive impact on the safety of operation as recognized in Generic Letter 89-14. The proposed change does not affect plant equipment configuration or operation and is administrative in nature. Therefore, it does not create the possibility of a new or different kind of accident from any previously evaluated.

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

The removal of the 3.25 limitation on extending surveillance requirements will result in a benefit to safety when plant conditions are not conducive to the safe conduct of surveillance requirements. This will provide greater flexibility in the use of the provision for extending surveillance intervals, reduce the administrative burden associated with its use, and have a positive affect on safety.

E. Safety Analysis of the Proposed Amendment

Industry experience has shown that the 18-month surveillance interval, with the provision to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has routinely granted requests for one time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25 percent allowance for extending surveillances that are performed on a refueling outage basis.

The use of the allowance to extend surveillance intervals by 25 percent can also result in a significant safety benefit for surveillances that are performed on a routine basis during plant operation. This safety benefit is incurred when a surveillance interval is extended at a time when conditions are not suitable for performing the surveillance. Examples of this include transient plant operating conditions in which safety systems are out of service because of ongoing surveillance or maintenance activities. In such cases, the safety

benefit of allowing the use of the 25 percent allowance to extend a surveillance interval would outweigh any benefit derived by limiting three consecutive surveillances intervals to the 3.25 limit. Also, there is the administrative burden associated with tracking the use of the 25 percent allowance to ensure compliance with the 3.25 limit. On the basis of these considerations, Arizona Public Service and the NRC staff (as stated in Generic Letter 89-14) have concluded that removal of the 3.25 limit will have an overall positive impact on safety.

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.

As discussed in the Sections D and E of this amendment, no reduction in safety and no new accidents are introduced by this change. This amendment is administrative in nature, does not affect effluents or power levels, and has no environmental impact.

G. Marked-up Technical Specification Change Pages

3/4 0-2 B 3/4 0-2

Inserts for Technical Specification Change Pages

Insert 1 Page 3/4 0-2

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

Insert 2 Page B 3/4 0-2

Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with a 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through the surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.