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 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530

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SUBJECT: Application for amends to Licenses NPF-41, NPF-51 & NPF-74,
 revising Tech Spec Section 6.5.1.

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

161-02978-WFC/JRP
March 16, 1990

Docket Nos. STN 50-528/529/530

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

Reference: Letter from W. F. Conway to USNRC, 161-02133-WFC/JRP,
dated July 26, 1989

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Technical Specification Amendment Request
Administrative Controls
File: 90-F-005-419.05; 90-056-026

This letter supersedes the referenced letter which requested an amendment to the PVNGS Units 1, 2, and 3 Technical Specifications Section 6.5.1 Plant Review Board (PRB) and Section 6.5.2 Technical Review and Control Activities. The additional information being provided was previously discussed with Mr. T. L. Chan of your staff. The amendment request changes the composition of the PRB in that the specific titles of the members are being deleted and replaced with a generic phrase. Additionally, the change deletes from the PRB responsibilities the review of administrative control procedures and changes, thus allowing the PRB to increase its focus on matters more directly relating to nuclear safety. And finally, the amendment reflects an organizational change, the addition of a Plant Director to the site staff and reallocation of managerial responsibilities associated with that change. The changes presented herewith are administrative and constitute no safety concerns.

Enclosed with this change 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

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March 16, 1990

Pursuant to 10 CFR 50.91(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 would like to request that this amendment become effective within forty-five (45) days of issuance. Should you have any questions please call.

Sincerely,



WFC/JRP/jle

Attachments

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

161-02978-WFC/JRP
March 16, 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
W. F. Conway

Sworn To Before Me This 16 Day Of March, 1990.

Linda B. Spill
Notary Public

My Commission Expires

My Commission Expires June 5, 1992



ATTACHMENT

A. DESCRIPTION OF AMENDMENT REQUEST

The proposed Technical Specification amendment would revise Section 6.5.1.2, Composition, in that the titles: Engineering Evaluations Manager; Operations Standards Supervisor; Mechanical Maintenance Standards Supervisor; Electrical Maintenance Standards Supervisor; I&C Standards Supervisor; Operations Managers for Units 1, 2 and 3; STA Supervisor; and the Quality Systems/Engineering Manager would be deleted from PRB composition. Section 6.5.1.2 would be revised to now read, "The PRB shall be composed of nine members from the Palo Verde management staff. These positions will be designated by the Plant Director in Administrative Procedures."

The proposed amendment would have the PRB advise the Plant Director in lieu of the Plant Manager. Also it would revise Section 6.5.1.6; Responsibilities, in that PRB no longer will be required to review administrative control procedures and changes. It would also revise Section 6.5.1.7a to correctly reference 6.5.1.6b in lieu of 6.5.1.6c, based on the deletion of the above requirements. The final change corrects various titles of individuals to be in line with recent organizational changes and would also delete the term station nuclear production in Section 6.5.2.4.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

The purpose of the PRB is that it shall function to advise the Plant Director on matters relating to nuclear safety. PRB also reviews the following areas: proposed changes to Technical Specifications, tests, experiments and unplanned events that effect nuclear safety; violations of Technical Specifications; reportable events and review and documentation of judgment concerning prolonged operation in bypass, channel trip, and/or repair of defective protection channels of process variables placed in bypass since the last PRB meeting. PRB also performs special reviews and reports as requested by the Vice President - Nuclear Production, Plant Director or the PRB Chairman.

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

The proposed Technical Specification amendment would provide for increased management involvement in PRB reviews and also allow PRB to reduce procedure review workload which would increase involvement in reviewing Technical Specification violations, reportable events and other nuclear safety issues. It would revise the scope of PRB responsibilities to include review of additional items designated by the Vice President - Nuclear Production, Plant Director, or the PRB Chairman, such as a general safety review of procedures involving the operation of important plant equipment or the response to abnormal operating conditions. The change would correct individuals titles based on organizational changes and finally, the change would delete the titles of the members from the

composition of PRB. This would allow Palo Verde to implement changes to the PRB composition without first having to have NRC approval through the issuance of a license amendment.

The NRC has approved similar amendment requests by other utilities which delete the specific titles of members of PRB based on it being an administrative change. The areas of responsibility of the PRB members will be located in Administrative Procedures. Changes to these procedures are made in accordance with 10 CFR 50.59.

D. BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION

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 Technical Specification 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 or operation of the facility. All of the changes are administrative in nature and would not increase the probability or the 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 Technical Specification change will not create the possibility of a new or different kind of accident from any accident previously evaluated. Since there are no changes in the way the plant is being operated, the potential for an unanalyzed accident is not created. No new failure modes are introduced. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed Technical Specification change does not involve a significant reduction in a margin of safety. The proposed changes do not have any adverse impact on containment integrity, systems or components important to safety or any other design feature. The



proposed change is administrative. Since the proposed changes do not affect the consequences of an accident previously analyzed, there is no reduction in the margin of safety.

E. SAFETY ANALYSIS OF THE PROPOSED CHANGE REQUEST

The proposed Technical Specification change 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 change deletes the composition of PRB and replaces it with "The PRB shall be composed of nine members from the Palo Verde management staff. These positions will be designated by the Plant Director in Administrative Procedures." This would allow Palo Verde to implement changes to the PRB composition without first having to obtain NRC approval. The areas of responsibility of the PRB members will be located in Administrative Procedures. Changes to these procedures are made in accordance with 10 CFR 50.59. Also as part of the composition change the makeup of the PRB will be from management personnel which would allow decisions to be made and approved at an appropriate level. The change also deletes the review of administrative control procedures and changes. This will allow PRB to review in greater detail safety significant items. PRB will continue reviewing administrative control procedures as they relate to nuclear safety as well as procedures which may have an impact on operation of the units.

The administrative control procedures which will no longer be reviewed by PRB will be reviewed by appropriate personnel. Technical Specification Section 6.5.2.1 states that the Director, Standards and Technical Support shall assure that each procedure and program required by Specification 6.8 and other procedures which affect nuclear safety is prepared by a qualified individual or organization. Each such procedure shall be reviewed by an individual or group other than the one which prepared the procedure, however, they may be from the same organization as the individual which prepared the procedure. Based on this information, it is concluded that the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the UFSAR will not be increased.

The proposed Technical Specification change will not create the possibility of an accident or malfunction of a different type than any evaluated previously in the UFSAR. No physical changes are being made to the facility nor are there any changes being made which affect the operation of the facility. The change in the composition of PRB will not affect their ability to carry out the responsibilities assigned to them. With the higher level of review, additional assurance is provided that management is fully aware of proposed changes to the facility. The review of administrative control procedures will be at a level commensurate with its function such that individuals responsible for reviews performed in accordance with sections 6.5.2.1, 6.5.2.2 and 6.5.2.3 shall be members of the supervisory staff, previously designated by the Director Standards and Technical Support to perform such reviews. Each such review shall include a determination of whether or not additional, cross disciplinary, review

is necessary. If deemed necessary, such review shall be performed by the appropriate designated review personnel. Therefore, the proposed Technical Specification change will not create the possibility of an accident or malfunction of a different type than any evaluated previously in the UFSAR.

The proposed Technical Specification change will not reduce the margin of safety as defined in the basis for any Technical Specification. As part of PRBs responsibilities they will review unit operations to detect potential nuclear safety hazards. This review combined with the review of proposed changes to the Technical Specifications ensures that a proposed change will not have an adverse impact on equipment, components or operation of the facility and will not reduce the margin of safety as defined in the basis for any Technical Specification. Therefore, since the proposed Technical Specification change does not affect the consequences of an accident previously analyzed, there is no reduction in the margin of safety.

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed Technical Specification 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 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 SPECIFICATION PAGES

(See Attached Pages 6-7, 6-8, 6-9 and 6-10).



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