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SUBJECT: Application for amends to licenses NPF-41, NPF-51 & NPF-74, D
 respectively. Reducing allowed out of svc time for shutdown
 cooling sys suction relief valves, adding ACTION Statements S
 for SCS Suction relief valve inoperability & Clarification.

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 TITLE: Generic Ltr 90-06 Resolution of GE 70N94 PORVs & Block Valve Reliabil A

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

161-03995-WFC/DAF
June 7, 1991

Docket Nos. STN 50-528/529/530

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, DC 20555

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Proposed Technical Specification Amendments to Specification
3.4.8.3 and Associated Surveillance Requirements, to
Incorporate the Recommendations of Generic Letter 90-06,
"Resolution of Generic Issue 70, Power-Operated Relief Valve
and Block Valve Reliability," and Generic Issue 94,
"Additional Low-Temperature Overpressure Protection for Light-
Water Reactors, Pursuant to 10 CFR 50.54 (f)"
File: 91-005-419.05; 91-056-026

On June 25, 1990, the NRC issued Generic Letter 90-06 which provided licensees with guidance on preparing license amendments to incorporate additional low temperature overpressure protection. In response to the Generic Letter and pursuant to 10 CFR 50.90, Arizona Public Service Company (APS) submits herewith a request to amend Facility Operating Licenses NPF-41, NPF-51, and NPF-74, for PVNGS Units 1, 2, and 3, respectively. The proposed amendments 1) reduce the allowed out of service time for the shutdown cooling system (SCS) suction relief valves; 2) add new ACTION Statements for SCS suction relief valve inoperability; and for periodic verification that the Reactor Coolant System (RCS) is properly vented, and 3) clarify the associated Surveillance Requirements.

Provided in the attachment to this letter are the following sections which support the proposed Technical Specification change:

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

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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Proposed Technical Specification Amendments
to Specification 3.4.8.3
Page Two

Pursuant to 10 CFR 50.91 (b)(1), and by copy of this letter and attachment, the Arizona Radiation Regulatory Agency is being notified of this request for a Technical Specification change.

If you should have questions, please contact Michael E. Powell of my staff at (602) 340-4981.

Sincerely,



WFC/DAF/pmm

Attachment

cc: J. B. Martin
C. F. Tedford
C. M. Trammell.
D. H. Coe
A. C. Gehr
A. H. Gutterman

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 7 Day Of June, 1991.

Linda B. Spill
Notary Public

My Commission Expires

June 5, 1992



ATTACHMENT

A. DESCRIPTION OF THE PROPOSED TECHNICAL SPECIFICATION AMENDMENT REQUEST

A new Technical Specification 3.4.8.3 ACTION Statement a is added which reads as follows:

- a. From MODE 4 with one SCS relief valve inoperable, restore the inoperable valve to OPERABLE status within 7 days or depressurize and vent the RCS through at least a 16 square inch vent(s) within the next 8 hours. Do not start a reactor coolant pump if the steam generator water temperature is greater than 100°F above any RCS cold leg temperature.

The existing Technical Specification 3.4.8.3 ACTION Statement a is changed to ACTION Statement b, and is revised to reduce the allowed out of service time for SCS relief valve inoperability while in MODES 5 or 6. The revised ACTION Statement reads as follows:

- b. From MODES 5 or 6 with one SCS relief valve inoperable, either (1) restore the inoperable valve to OPERABLE status within 24 hours or (2) reduce T_{cold} to less than 200°F and complete depressurization and venting of the RCS through at least a 16 square inch vent(s) within a total of 32 hours. Do not start a reactor coolant pump if the steam generator secondary water temperature is greater than 100°F above any RCS cold leg temperature.

A new Technical Specification 3.4.8.3 ACTION Statement d is added which reads as follows:

- d. With the RCS vented per ACTIONS a, b, or c, verify the vent pathway at least once per 31 days when the pathway is provided by a valve(s) that is locked, sealed, or otherwise secured in the open position; otherwise, verify the vent pathway every 12 hours.

The existing Technical Specification 3.4.8.3 ACTION Statements b, c, and d are changed to c, e, and f, respectively.

Technical Specification Surveillance Requirement 4.4.8.3.1 is revised to delete "once every 8 hours" and add in its place the following: "at least once per 31 days when the pathway is provided by a valve(s) that is locked, sealed, or otherwise secured in the open position; otherwise, verify alignment every 12 hours".

Technical Specification Surveillance Requirement 4.4.8.3.2 is revised to read as follows:

- 4.4.8.3.2 The SCS suction line relief valves shall be verified OPERABLE as required by Specification 4.0.5.

B. PURPOSE OF THE TECHNICAL SPECIFICATIONS

The purpose of Technical Specification 3.4.8.3 is to provide low temperature overpressure protection for the reactor coolant system. This specification requires that both SCS suction relief valves be operable and aligned to provide overpressure protection whenever the RCS is less than or equal to 214°F during cooldown and 291°F during heatup.

The Technical Specification 3.4.8.3 ACTION Statements describe the specific actions required to be taken should one or both of the SCS suction relief valves be inoperable.

The Technical Specification Surveillance Requirements 4.4.8.3.1 and 4.4.8.3.2 require that specific tests and verifications be performed to ensure that the SCS suction relief valves are capable of performing their intended function.

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

The proposed Technical Specification changes are necessary to provide increased reliability for the low temperature overpressure protection relief valves.

D. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

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 a 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.

The NRC has previously issued, in the Federal Register, examples of amendments that are considered not likely to involve significant hazards considerations. This proposed amendment request matches example I(C)(2)(e)(ii) described in Federal Register notice 51FR7751, dated March 6, 1986, as follows:

"(ii) A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications, e.g., a more stringent surveillance requirement."

A discussion of the above 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 amendments 1) reduce the allowed out of service time for the SCS suction relief valves; 2) add new ACTION Statements for SCS suction relief valve inoperability; and for periodic verification that the RCS is properly vented, and 3) clarify the associated Surveillance Requirements. These changes to the Technical Specifications provide increased reliability for the low temperature overpressure protection relief valves which will reduce the probability of a low temperature overpressurization event. The consequences of a low temperature overpressurization event are unchanged. Therefore, the proposed amendments do not involve a significant 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.

The proposed amendments limit the period of time that an individual low temperature overpressure protection relief valve may be out of service before compensatory action is initiated, thereby reducing the possibility of a low temperature overpressurization event. The proposed amendments do not modify the design or operation of plant equipment. Therefore, the proposed amendments do 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 amendments ensure that the low temperature overpressure protection system has appropriate compensatory measures implemented in a more timely manner whenever an individual SCS valve is inoperable. These changes represent an additional operating limitation but do not change the bases or assumptions used in the safety analyses for this system. Therefore, the proposed amendments will not involve a significant reduction in a margin of safety.

E. SAFETY ANALYSIS FOR THE PROPOSED TECHNICAL SPECIFICATION AMENDMENT REQUEST

NRC Generic Letter 90-06 recommended a more limited out of service time for low temperature overpressure protection relief valves to reduce the probability of a low temperature overpressurization event. The proposed amendments 1) reduce the allowed out of service time for the SCS suction relief valves; 2) add new ACTION Statements for SCS suction relief valve inoperability; and for periodic verification that the RCS is properly vented, and 3) clarify the associated Surveillance Requirements. These changes to the Technical Specifications provide increased reliability for the low temperature overpressure protection relief valves which will reduce the probability of a low temperature overpressurization event. The consequences of a low temperature overpressurization event are not affected by these changes. Therefore, the proposed amendments do not involve an increase in the probability or consequences of an accident previously evaluated.

The proposed amendments do not modify the low temperature overpressure protection system or related plant equipment. In addition, operation of plant equipment is not affected by these changes. As such, this amendment request does not create the possibility of a new or different kind of accident from any accident previously evaluated.

This amendment request incorporates conservative limitations for SCS suction relief valve inoperability and RCS low temperature overpressure protection. These measures enhance overall plant safety by increasing the reliability of the low temperature overpressure protection system. These limitations do not change the bases or assumptions used in the safety analyses for this system. As such, the proposed amendments will not reduce the margin of safety at PVNGS.

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

NRC Generic Letter 90-06 recommended a more limited out of service time for low temperature overpressure protection relief valves to reduce the probability of a low temperature overpressurization event. The proposed amendments 1) reduce the allowed out of service time for the SCS suction relief valves; 2) add new ACTION Statements for SCS suction relief valve inoperability; and for periodic verification that the RCS is properly vented, and 3) clarify the associated Surveillance Requirements. These changes to the Technical Specifications provide increased reliability for the low temperature overpressure protection relief valves which will reduce the probability of a low temperature overpressurization event.

APS has determined that the proposed amendments involve no change in the amount or type of any effluent that may be released offsite, and that there is no increase in individual or cumulative occupational radiation exposure. As such, operation of PVNGS Units 1, 2, and 3, in accordance with the proposed amendments, does not involve an unreviewed environmental safety question.

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:

Name	Address
Mr. A. B. C.	123 Main St., New York, N. Y.
Mr. D. E. F.	456 Elm St., Boston, Mass.
Mr. G. H. I.	789 Oak St., Chicago, Ill.
Mr. J. K. L.	101 Pine St., Philadelphia, Pa.
Mr. M. N. O.	202 Cedar St., St. Louis, Mo.
Mr. P. Q. R.	303 Birch St., San Francisco, Cal.
Mr. S. T. U.	404 Walnut St., Cincinnati, Ohio.
Mr. V. W. X.	505 Maple St., Detroit, Mich.
Mr. Y. Z. A.	606 Spruce St., Portland, Me.
Mr. B. C. D.	707 Ash St., New Orleans, La.
Mr. E. F. G.	808 Hickory St., Little Rock, Ark.
Mr. H. I. J.	909 Sycamore St., Memphis, Tenn.
Mr. K. L. M.	1010 Dogwood St., Nashville, Tenn.
Mr. N. O. P.	1111 Magnolia St., Louisville, Ky.
Mr. Q. R. S.	1212 Redwood St., Sacramento, Cal.
Mr. T. U. V.	1313 Cypress St., Fresno, Cal.
Mr. W. X. Y.	1414 Juniper St., Bakersfield, Cal.
Mr. Z. A. B.	1515 Fir St., Modesto, Cal.
Mr. C. D. E.	1616 Willow St., Stockton, Cal.
Mr. F. G. H.	1717 Poplar St., Yuba City, Tex.
Mr. I. J. K.	1818 Cottonwood St., Amarillo, Tex.
Mr. L. M. N.	1919 Mesquite St., El Paso, Tex.
Mr. O. P. Q.	2020 Palm St., Phoenix, Ariz.
Mr. R. S. T.	2121 Olive St., Tucson, Ariz.
Mr. U. V. W.	2222 Peach St., Albuquerque, N. M.
Mr. X. Y. Z.	2323 Apple St., Santa Fe, N. M.
Mr. A. B. C.	2424 Cherry St., Las Vegas, Nev.
Mr. D. E. F.	2525 Pear St., Reno, Nev.
Mr. G. H. I.	2626 Plum St., Carson City, Nev.
Mr. J. K. L.	2727 Peach St., Salt Lake City, Utah.
Mr. M. N. O.	2828 Apple St., Ogden, Utah.
Mr. P. Q. R.	2929 Cherry St., Provo, Utah.
Mr. S. T. U.	3030 Peach St., St. George, Utah.
Mr. V. W. X.	3131 Apple St., Panguitch, Utah.
Mr. Y. Z. A.	3232 Cherry St., Hatch, N. M.
Mr. B. C. D.	3333 Peach St., Lordsburg, N. M.
Mr. E. F. G.	3434 Apple St., Silverton, Colo.
Mr. H. I. J.	3535 Cherry St., Durango, Colo.
Mr. K. L. M.	3636 Peach St., Grand Junction, Colo.
Mr. N. O. P.	3737 Apple St., Montrose, Colo.
Mr. Q. R. S.	3838 Cherry St., Silt, Colo.
Mr. T. U. V.	3939 Peach St., Steamboat, Colo.
Mr. W. X. Y.	4040 Apple St., Silver Lake, Colo.
Mr. Z. A. B.	4141 Cherry St., Fort Collins, Colo.
Mr. C. D. E.	4242 Peach St., Greeley, Colo.
Mr. F. G. H.	4343 Apple St., Weldon, Colo.
Mr. I. J. K.	4444 Cherry St., Fort Morgan, Colo.
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Mr. R. S. T.	4747 Cherry St., Greeley, Colo.
Mr. U. V. W.	4848 Peach St., Weldon, Colo.
Mr. X. Y. Z.	4949 Apple St., Fort Morgan, Colo.
Mr. A. B. C.	5050 Cherry St., Fort Lupton, Colo.

G. MARKED-UP TECHNICAL SPECIFICATION CHANGE PAGES

See attached Technical Specification pages 3/4 4-32 and 3/4 4-33 for PVNGS Units 1, 2, and 3, respectively.

