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 RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Application for amends to Licenses NPF-41,NPF-51 & NPF-74,
 revising TS Section 3/4.9.9 to change containment purge
 valve isolation sys operability requirements for consistency
 w/other containment penetration operability requirements.

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

161-04690-WFC/JCO

March 20, 1992

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Washington, DC 20555

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Proposed Amendment to Technical Specification Section 3/4.9.9
File: 92-005-419.05; 92-056-026

Arizona Public Service Company (APS) is requesting an amendment to the surveillance requirements of Technical Specification Section 3/4.9.9 for PVNGS Units 1, 2, and 3. This request changes the Containment Purge Valve Isolation System (CPVIS) operability requirements to be consistent with other containment penetration operability requirements. Specifically, the proposed amendment will add to the existing surveillance requirements that the CPVIS be declared OPERABLE if a deactivated automatic valve in the respective containment purge penetration is administratively secured in the closed position. The Bases of Section 3/4.9.9 are also changed to reflect this amendment.

Provided in the enclosure to this letter, for this proposed Technical Specification amendment, are the following:

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

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

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U. S. Nuclear Regulatory Commission
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Proposed Technical Specification Amendment
Page 2

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

Sincerely,

A handwritten signature in cursive script, appearing to read "W. A. Wright".

WFC/JCO/jco

Enclosure

cc: J. B. Martin
D. H. Coe
A. C. Gehr
A. H. Gutterman
W. A. Wright

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 20 Day Of March, 1992.

Linda B. Spell
Notary Public

My Commission Expires

June 5, 1992

ENCLOSURE

PROPOSED AMENDMENT TO TECHNICAL SPECIFICATION SECTION 3/4.9.9

A. **DESCRIPTION OF THE PROPOSED AMENDMENT REQUEST**

Surveillance Requirement 4.9.9 is amended by adding another method to demonstrate Containment Purge Isolation Valve System (CPVIS) OPERABILITY. The system can be demonstrated OPERABLE by verifying that the respective containment purge penetration is isolated by a deactivated automatic valve administratively secured in the closed position.

In addition to the present requirement to perform the surveillance requirements prior to the start of and at least once per 7 days during CORE ALTERATIONS, Surveillance Requirement 4.9.9 is changed to require that the surveillance actions also be performed prior to the start of and at least once per 7 days during movement of irradiated fuel in the containment building.

Technical Specification Bases 3/4.9.9 is also changed to reflect the changes in the Technical Specification.

B. **PURPOSE OF THE TECHNICAL SPECIFICATION**

Technical Specification 3.9.9 ensures that the containment purge isolation valves can and will close, if open, in the event of (1) a radiological accident in containment during CORE ALTERATIONS, or (2) movement of irradiated fuel in the containment, or (3) Loss of Coolant Accident (LOCA) during operations. Surveillance Requirement 4.9.9 verifies that the isolation function can be performed to ensure that the release of radioactive material from the containment atmosphere to the environment is restricted.

C. **NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT**

The containment purge system is designed to purge the containment atmosphere to the plant vent stack while introducing filtered and treated make-up air from the outside to provide adequate ventilation for personnel comfort when the plant is shutdown during refueling and for limited periods during power operation to allow operator access. The system consists of 42-inch refueling purge valves and 8-inch power access purge valves plus attendant controls. The 42-inch containment purge valves are sealed closed during operation in Modes 1 through 4. A description of the containment purge system is provided in UFSAR Section 9.4.6.

The proposed amendment makes Surveillance Requirement 4.9.9 consistent with the surveillance requirements for containment penetrations in Surveillance Requirement 4.9.4 which states that each of the required containment building penetrations shall be determined to be either in its closed/isolated condition or capable of being closed by an OPERABLE automatic containment purge valve. This is accomplished by either verifying the penetrations are in their closed/isolated condition or testing the containment purge valves per the applicable portions of Surveillance Requirement 4.9.9.

March 20, 1992

Currently, Surveillance Requirement 4.9.9 only allows for declaring the system OPERABLE by verifying that containment purge valve isolation occurs on a manual initiation and a Containment Purge Isolation Actuation Signal (CPIAS). The proposed change adds a provision that the CPVIS can be declared OPERABLE by verifying that the respective containment purge penetration is isolated by a deactivated automatic valve which is administratively secured in the closed position. This is equivalent to the requirement of Surveillance Requirement 4.9.4 to verify that the containment building penetrations are in their closed/isolated condition.

The proposed amendment allows for operational flexibility. Consistency permits the CPVIS to be considered OPERABLE when valve(s) in a specific penetration are not capable of being isolated automatically, as long as the valve(s) are deenergized and administratively secured in the closed position. For example, the proposed amendment allows for operation of the refueling purge system during CORE ALTERATIONS or movement of irradiated fuel in containment even if individual valves in the power access purge system are closed.

D. SAFETY ANALYSIS OF THE PROPOSED TECHNICAL SPECIFICATION AMENDMENT

The proposed change adds an alternate criteria for declaring the CPVIS OPERABLE. The alternate criteria verifies that the valve(s) are in the position that they would assume if required to actuate automatically, i.e., closed. The 42-inch valve(s) are normally closed with the breakers for the valve(s) locked open except during refuelings. During refuelings, power is available to open and close the valves as required. The 42-inch valves will close automatically upon receipt of a CPIAS. The 8-inch valve(s) are used during power operations and may be used during refuelings. These valves will also close automatically upon receipt of a CPIAS. The proposed amendment will provide an increase in the margin of safety already existent within the Technical Specifications by reducing the potential for a purge isolation valve to fail to close on a CPIAS. The proposed change is bounded by the fuel handling accident analysis in the Updated Final Safety Analysis Report (UFSAR) Section 15.7.4.2. since the subject analysis assumes that the purge valves are open during the event.

E. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission has provided standards for determining whether a no 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.

A discussion of these standards as they relate to this amendment request follows:

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

The probability and consequences of an accident previously evaluated will not be increased by this proposed Technical Specification change. Section 15.7.4.2 of the UFSAR discusses fuel handling accidents. Offsite doses are calculated as less than one-third of 10 CFR 100 limits. The accident analyses assume that the containment purge isolation valves are open and that there is an instantaneous release of activity from the containment. This Technical Specification change reduces the probability and consequences of a radiological release to the environment by requiring that the containment purge valves be closed, if not verified to be closeable on a CPIAS. A valve in the closed position removes the potential for the valve to fail to close on an isolation signal.

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

The proposed Technical Specification change does not introduce any new operational conditions. The proposed amendment does not affect the requirement that the refueling purge valves be sealed and their breakers be locked open except during refueling operations.

The effect of this change will be to further limit when containment purge penetrations are permitted to be open. The proposed change does not affect plant equipment configuration 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 containment purge isolation valves are not credited with mitigating the effects of a fuel handling accident in UFSAR Chapter 15 accident analyses. The proposed change will increase the margin of safety, not decrease the margin, by requiring that valve(s) be placed in their actuated position. This will further mitigate the effects of a fuel handling accident.

THE
FEDERAL BUREAU OF INVESTIGATION
UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D. C. 20535

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed amendment changes the SURVEILLANCE requirements for the Containment Purge Isolation System.

Arizona Public Service Company has determined that the proposed amendment involves 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 amendment, does not involve an environmental impact.

G. MARKED-UP TECHNICAL SPECIFICATION CHANGE PAGES

<u>PVNGS Unit 1</u>	<u>PVNGS Unit 2</u>	<u>PVNGS Unit 3</u>
3/4 9-10	3/4 9-10	3/4 9-10
B 3/4 9-3	B 3/4 9-3	B 3/4 9-3

