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 AUTH.NAME AUTHOR AFFILIATION
 CONWAY,W.F. Arizona Public Service Co. (formerly Arizona Nuclear Power R
 RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Application for amends to Licenses NPF-41,NPF-51 & NPF-65,
 requesting change to word pressurizer to RCS for item 4 in
 tables 3.3-10 & 4.3-7. D
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Arizona Public Service Company

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102-02604-WFC/TRB/JNI

August 5, 1993

WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

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
Docket Nos. STN 50-528/529/530
Proposed Amendment to Technical Specification
Section 3/4.3.3.6
File: 93-005-419.05

In accordance with 10 CFR 50.90, Arizona Public Service Company (APS) is requesting an amendment to Technical Specification 3/4.3.3.6 "Post-Accident Monitoring Instrumentation," Table 3.3-10 and Table 4.3-7. This amendment is requested to change the word "Pressurizer" to "Reactor Coolant System" for item #4 in both Tables 3.3-10 and 4.3-7. This change is administrative in nature in that it only corrects the nomenclature of the instrumentation.

Provided in the enclosure to this letter 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 Pages

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

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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Proposed Amendment to Technical Specification
Page 2

If you have any questions, please contact Thomas R. Bradish at (602) 393-5421.

Sincerely,

A handwritten signature in black ink, appearing to read 'WFC/TRB/JNI/rv', written in a cursive style.

WFC/TRB/JNI/rv

Enclosure

cc: B. H. Faulkenberry
J. A. Sloan
A. V. Godwin

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 5 Day Of August, 1993.

Linda B. Spell
Notary Public

My Commission Expires

March 31, 1996



ENCLOSURE
PROPOSED AMENDMENT TO
TECHNICAL SPECIFICATION 3/4.3.3.6

A. DESCRIPTION OF THE PROPOSED AMENDMENT REQUEST

The proposed Technical Specification amendment changes Table 3.3-10, item 4, and Table 4.3-7, item 4, from "Pressurizer Pressure - Wide Range" to "Reactor Coolant System Pressure - Wide Range." The new wording agrees with the as-built configuration and the field equipment identification.

This is an administrative change and does not change equipment, configuration, or operation.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

Section 3/4.3.3.6, POST-ACCIDENT MONITORING INSTRUMENTATION

The OPERABILITY of the post-accident monitoring instrumentation (Table 3.3-10) ensures that sufficient information is available on selected plant parameters following an accident. This capability is consistent with the recommendations of Regulatory Guide (RG) 1.97, "Instrumentation for Light-Water-Cooled Nuclear Plants to Assess Plant Conditions During and Following an Accident," December 1975, and NUREG 0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations."

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

This Technical Specification amendment will clarify the intended instrumentation required and eliminate potential confusion between the reactor coolant system pressure instruments and the pressurizer pressure instruments.

D. SAFETY ANALYSIS OF THE PROPOSED TECHNICAL SPECIFICATION AMENDMENT

The Post-Accident Monitoring Instrumentation Tables in the Technical Specification use the wording "Pressurizer Pressure," instead of "Reactor Coolant System Pressure," to describe the wide range pressure instrumentation required for Post-Accident Monitoring. RG 1.97, Revision 2, December 1980, refers to Reactor Coolant System Pressure with a range of 0 to 4000 psig. The PVNGS UFSAR, Table 1.8-1, refers to Reactor Coolant System Pressure with a range of 0 to 4000 psig. PVNGS equipment descriptions list both instruments, Reactor Coolant System Pressure 0-4000 psig and Pressurizer Pressure 0-3000 psig. This amendment will clarify the intended instrumentation required and eliminate potential confusion between the reactor coolant system pressure instruments and the pressurizer pressure instruments.

E. 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. 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.

This amendment request does not involve a significant increase in the probability or consequences of an accident previously evaluated since the change clarifies the equipment description of Technical Specification Table 3.3-10, item 4, and Table 4.3-7, item 4, by changing the wording from "Pressurizer Pressure" to "Reactor Coolant System Pressure."

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

This amendment request does not create the possibility of a new or different kind of accident from any accident previously analyzed since the change does not modify, add or remove equipment. The change clarifies the equipment description of Technical Specification Table 3.3-10, item 4, and Table 4.3-7, item 4, by changing the wording from "Pressurizer Pressure" to "Reactor Coolant System Pressure."

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

The margin of safety presently provided is not affected by the change. The change does not affect any process parameters or system setpoints. The change clarifies the equipment description of Technical Specification Table 3.3-10, item 4, and Table 4.3-7, item 4, by changing the wording from "Pressurizer Pressure" to "Reactor Coolant System Pressure."

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

APS has determined that the proposed amendment involves no change in the amount or type of 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 environmental impact.

G. MARKED-UP TECHNICAL SPECIFICATION PAGES

Units 1, 2, and 3: page 3/4 3-58 (Table 3.3-10)
 page 3/4 3-60 (Table 4.3-7)

