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 CONWAY,W.F. Alabama Public Service Co.
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SUBJECT: Application for amend to license NPR-41,NPF-51 & NFP-74
 requested change to minimum condensate storage tank
 indicated level from 25 feet to 29.5 feet.

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102-02884-WFC/AKK/RKR

March 28, 1994

WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

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 3/4.3.7.1.3
File: 94-005-419.05; 94-056-026**

Pursuant to 10 CFR 50.90, Arizona Public Service Company (APS) submits herewith a proposed amendment to Technical Specification 3/4.3.7.1.3. The proposed amendment is requested to change the minimum condensate storage tank (CST) indicated level from 25 feet to 29.5 feet. APS engineering determined that a level of 25 feet would not ensure that 300,000 gallons of water is available in the CST.

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

The Plant Review Board and Offsite Safety Review Committee have reviewed the proposed amendment to Technical Specification 3/4.3.7.1.3 and determined that the proposed amendment does not constitute an unreviewed safety question or create a nuclear safety hazard. 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
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Should you have any questions, please contact Richard A. Bernier at (602) 393-5882.

Sincerely,

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

WFC/AKK/RKR/rv
Enclosure

cc: K. E. Perkins, Jr.
K. E. Johnston
A. V. Godwin

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[illegible]

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.

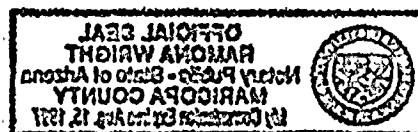
W. F. Conway

Sworn To Before Me This 28th Day Of March, 1994.

Notary Public

My Commission Expires





ENCLOSURE

PROPOSED AMENDMENT TO TECHNICAL SPECIFICATION

SECTION 3/4.3.7.1.3

A. DESCRIPTION OF THE PROPOSED AMENDMENT REQUEST

The proposed amendment to Technical Specification 3/4.3.7.1.3 increases the minimum indicated level in the condensate storage tank (CST) from 25 feet to 29.5 feet. An editorial change is being made to Unit 3 Technical Specification 3/4.3.7.1.3 to change "with a level" to "with an indicated level." This makes Unit 3 Technical specification 3/4.3.7.1.3 consistent with the Units 1 and 2 Technical Specifications.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

The CST is a Seismic Category I storage tank that provides the primary source of water for the auxiliary feedwater (AFW) system. The AFW system is used to remove decay heat and to cool down the reactor coolant system (RCS) to a temperature (less than 350°F) where the shutdown cooling system can be used for decay heat removal. The most limiting event for the CST inventory is the Branch Technical Position (BTP) RSB 5-1 scenario (natural circulation cooldown) which requires that the CST have sufficient inventory to maintain the RCS in HOT STANDBY for 4 hours followed by a natural circulation cooldown to shutdown cooling entry conditions. Analysis and testing (letter ANPP-40069, PVNGS Natural Circulation Test Report, dated February 9, 1987) shows that a minimum water volume of 300,000 gallons is enough to satisfy the requirements of BTP RSB 5-1. The Design Basis of the CST described in UFSAR Section 9.2.6 and the BASES for Technical Specification 3/4.7.1.3 also state that the operability of the CST ensures that a minimum water volume of 300,000 gallons is available to maintain the RCS, with a concurrent total loss of offsite power, in HOT STANDBY for 8 hours followed by an orderly cooldown to an RCS temperature of less than 350°F where the shutdown cooling system may be placed in operation. Therefore, Technical Specification 3/4.3.7.1.3 ensures that the CST contains sufficient water volume to satisfy the requirements of BTP RSB 5-1 and UFSAR Section 9.2.6.

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

In late 1991, APS engineering started a setpoint validation project for PVNGS. During the setpoint validation project, APS engineering determined that incorrect assumptions were used for determining the indicated level in the CST. Based on the reevaluation of the CST indicated level, APS engineering determined that the minimum indicated CST level should be raised from 25 feet to 29.5 feet to ensure 300,000 gallons of water is available in the CST.

D. SAFETY ANALYSIS OF THE PROPOSED TECHNICAL SPECIFICATION AMENDMENT

The proposed amendment to Technical Specification 3/4.3.7.1.3 increases the minimum indicated level in the CST from 25 feet to 29.5 feet. This change ensures that the CST volume of 300,000 gallons is available to satisfy the requirements of BTP RSB 5-1 and UFSAR Section 9.2.6. Therefore, this change ensures that the assumptions in the safety analysis will be met.

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 based on the safety analysis for the CST minimum indicated level. The proposed change increases the minimum indicated CST water level from 25 feet to 29.5 feet. Increasing the minimum indicated CST water level ensures that the requirements of BTP RSB 5-1 and UFSAR Section 9.2.6 continue to be met. Therefore, this proposed change ensures that the consequences of an accident previously evaluated are not affected.

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 minimum water volume of 300,000 gallons is maintained by this change. The change in the CST minimum required water level does not change the operation of any plant equipment while ensuring that the required 300,000 gallons are available. Since this change does not affect the operation of plant equipment and ensures that the minimum CST water inventory is maintained, the proposed change does not create the possibility of a new or different kind of accident from any accident previously analyzed.

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

The margin of safety presently provided is not reduced by the proposed change in the CST minimum required water level. The proposed change ensures that the CST volume of 300,000 gallons is available to satisfy the requirements of BTP RSB 5-1, UFSAR Section 9.2.6 and the BASES for Technical Specification 3/4.3.7.1.3. Therefore, since the minimum required CST level is maintained, the proposed change does not involve a significant reduction in a margin of safety.

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 unreviewed environmental safety question.

G. MARKED-UP TECHNICAL SPECIFICATION PAGES

Units 1, 2, and 3 page 3/4 7-6

