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SUBJECT: Application for amends to licenses NPF-41, NPF-51 & NPF-74,
 revising TS 3.1.2.6, Figure 3.1-1, "Min Borated Water Vols"
 by relocating plant elevations that correspond to min
 required water vols for spent fuel pool to site procedures.

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WILLIAM L. STEWART
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-03346-WLS/SAB/TNW
May 2, 1995

U. S. Nuclear Regulatory Commission
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Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Proposed TS Amendment to Remove Plant Elevations From
TS Figure 3.1-1**

Pursuant to 10 CFR 50.90, Arizona Public Service Company (APS) submits herewith a proposed amendment to Technical Specification (TS) 3.1.2.6, Figure 3.1-1, "Minimum Borated Water Volumes" for PVNGS Units 1, 2, and 3. The proposed amendment would enhance the PVNGS TS by removing the plant elevations for the minimum water volume required in the spent fuel pool currently referenced in the TS Figure and relocating them into site procedures. This proposed TS amendment also includes two changes to correct administrative errors in the TS.

Provided in the enclosure to this letter are the following:

- A. Description of the Proposed Amendment
- 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 Consideration
- G. Marked-up Technical Specification Pages

In accordance with TS Section 6.5, the Plant Review Board and Offsite Safety Review Committee have reviewed and concur with this proposed amendment. By copy of this letter this request is being forwarded to the Arizona Radiation Regulatory Agency (ARRA) pursuant to 10CFR 50.91(b)(1).

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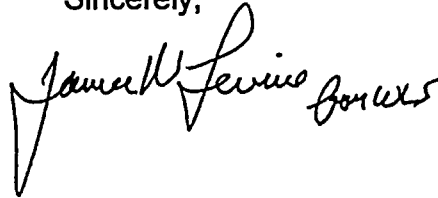
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Proposed Amendment to Technical Specification
Page 2

Should you have any questions, please contact Scott A. Bauer at (602) 393-5978.

Sincerely,

A handwritten signature in cursive script, appearing to read "James W. Levine". The signature is written in dark ink and is positioned below the word "Sincerely,".

WLS/SAB/TNW/rv
Enclosure

cc: K. E. Perkins
L. J. Callan
B. E. Holian
K. E. Johnston

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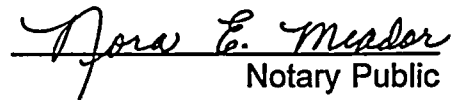
STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, J. M. Levine, represent that I am Vice President Nuclear Production, Arizona Public Service Company (APS), that the foregoing document has been signed by me on behalf of APS with full authority to do so, and that to the best of my knowledge and belief, the statements made therein are true and correct.



J. M. Levine

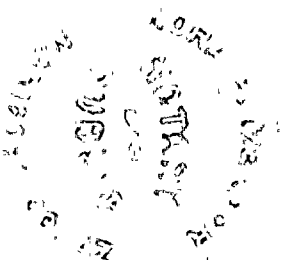
Sworn To Before Me This 2 Day Of May, 1995.



Notary Public

My Commission Expires

April 6, 1999



10/10/00
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ENCLOSURE

**PROPOSED AMENDMENT TO TECHNICAL SPECIFICATION 3.1.2.6
TO REMOVE PLANT ELEVATIONS FROM FIGURE 3.1-1**

A. **DESCRIPTION OF THE PROPOSED AMENDMENT**

Arizona Public Service Company (APS) proposes to revise Technical Specification (TS) 3.1.2.6, Figure 3.1-1, "Minimum Borated Water Volumes," to remove the plant elevations for PVNGS Units 1, 2, and 3. The plant elevations that correspond to the minimum required water volumes for the spent fuel pool (SFP) will be relocated into site procedures.

This TS amendment also proposes to remove the reference to Table 3.8-2 in TS 3.8.4.1 for Unit 3. This table was removed from the TS in Unit 3 amendment number 57, however, the reference to the table was not removed at that time due to an administrative oversight.

Finally, this proposed TS amendment adds the word "containment" to TS 4.6.3.1 in Unit 2. This addition is for clarification purposes and ensures consistency between all three Units' TS.

B. **PURPOSE OF THE TECHNICAL SPECIFICATION**

Technical Specification 3.1.2.6 ensures that a boration water source is available for reactivity control and makeup for losses due to contraction and evaporation.

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

TS Figure 3.1-1, "Minimum Borated Water Volumes," depicts the volumes of water required to be available in the SFP for different average reactor coolant system temperatures. The plant elevations shown in the figure do not correctly correspond to the volumes of water required in the SFP.

Table 3.8-2 was removed in TS amendment number 57 for Unit 3 as part of the removal of 5 tables of component lists. The reference to Table 3.8-2 in Unit 3 TS 3.8.4.1 was inadvertently not removed in that TS amendment. The reference to Table 3.8-2 was correctly removed in Units 1 and 2.

The word "containment" is being added to Unit 2 TS 4.6.3.1 to ensure consistency with all three Units' TS.

D. **SAFETY ANALYSIS OF THE PROPOSED TECHNICAL SPECIFICATION AMENDMENT**

The boron injection system for PVNGS ensures that negative reactivity control is available during each mode of operation. The components required to perform this function include: (1) borated water sources; (2) charging pumps; (3) separate

flow paths; (4) an emergency power supply from operable diesel generators; and (5) the volume control tank (VCT) outlet valve capable of isolating the VCT from the charging pump suction line.

TS 3.1.2.6 stipulates that both the SFP and the refueling water tank (RWT) shall be operable and be available as borated water sources during modes 1 through 4. The TS provides a curve, Figure 3.1-1, of average reactor coolant system (RCS) temperatures versus the volume of water required in the SFP. From this curve, the amount of water required at the highest average RCS temperature is 33,500 gallons. As an aid in the implementation of the TS, the required water volumes have been cross referenced to the corresponding elevation of the water level in the SFP.

If the SFP is utilized as a borated water source, line PCN-038-HCCA-3" is used to draw water from the SFP. This line has a siphon breaker hole at plant elevation 133'-6". The purposes of this siphon breaker is to prevent the SFP level from dropping below that required for shielding purposes. Therefore, the only water available for boron injection is the volume in the SFP that is above the siphon breaker hole.

The elevations shown in Figure 3.1-1 are incorrectly based on a siphon breaker hole elevation of 132'-6" instead of 133'-6". The elevations, therefore, do not correctly correspond to the volumes of water identified on the Figure. The volumes of water remain unchanged, only the conversion of these volumes to plant elevation is incorrect. Plant elevations corresponding to the required volumes of water do not need to be maintained in the TS. The plant elevations are there as an aid in the implementation of the surveillance tests. Relocating the plant elevations to site procedures eliminates the need for any subsequent TS amendments caused by any future changes that could affect the correlation between the required volume of water and plant elevation. Once the plant elevations are removed from the TS and relocated to site procedures, changes to the correlation between plant elevation and water volume will be controlled in accordance with the provisions of 10 CFR 50.59. Site procedures are now in place to verify the required minimum borated water volumes are demonstrated using the correct plant elevations.

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 – Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change eliminates the plant elevations from TS Figure 3.1-1, "Minimum Borated Water Volumes" for the SFP. The change is administrative in nature and does not involve any modifications to plant equipment or affect plant operation. The required volume of water in the SFP is identified on the figure and will remain unchanged by this amendment. This request relocates the plant elevations to site procedures where they will be controlled in accordance with the provisions of 10 CFR 50.59.

The removal of the reference to Table 3.8-2 in the Unit 3 TS 3.8.4.1 and adding the word "containment" to the Unit TS 4.6.3.1 are administrative change and do not involve any modifications to plant equipment or affect plant operation. These administrative changes do not affect the scope or intent of any test within the TS.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

Standard 2 – Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change eliminates the plant elevations from TS Figure 3.1-1, "Minimum Borated Water Volumes" for the SFP. The change is administrative in nature and does not involve any modifications to plant equipment or affect plant operation. The removal of plant elevations from the figure does not cause any change in the method by which any safety-related system performs its function. The required volume of water in the SFP is identified on the figure and will remain unchanged by this amendment.

The removal of the reference to Table 3.8-2 in the Unit 3 TS 3.8.4.1 and adding the word "containment" to the Unit 2 TS 4.6.3.1 are administrative changes and do not involve any modifications to plant equipment or affect plant operation. These administrative changes do not affect the scope or intent of any test within the TS.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

Standard 3 -- Does the proposed change involve a significant reduction in a margin of safety?

The proposed change eliminates the plant elevations from TS Figure 3.1-1, "Minimum Borated Water Volumes" for the SFP. The change is administrative in nature and does not involve any modifications to plant equipment or affect plant operation. The required volume of water in the SFP is identified on the figure and will remain unchanged by this amendment.

The removal of the reference to Table 3.8-2 in the Unit 3 TS 3.8.4.1 and adding the word "containment" to the Unit 2 TS 4.6.3.1 are administrative changes and do not involve any modifications to plant equipment or affect plant operation. These administrative changes do not affect the scope or intent of any test within the TS.

Therefore, based upon the above, the proposed change does not involve a significant reduction in a margin of safety.

F. ENVIRONMENTAL CONSIDERATION

The proposed change eliminates the plant elevations from TS Figure 3.1-1, "Minimum Borated Water Volumes" for the SFP. APS has determined that the proposed amendment involves no changes 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 amendment, does not involve an unreviewed environmental safety question.

G. MARKED-UP TECHNICAL SPECIFICATION PAGES

PVNGS Unit 1 page:	3/4 1-11
PVNGS Unit 2 page:	3/4 1-11, 3/4 6-19
PVNGS Unit 3 page:	3/4 1-11, 3/4 8-17

