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SUBJECT: Application for amend to licenses NPF-41,NPF-51 & NPF-74,
adopting approved STS format & content of Section 5.0,
"Design Features," as modified by approved changes to
improved STS.

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WILLIAM L. STEWART
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-03532-WLS/AKK/JRP
November 7, 1995

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

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 Specifications
Section 5.0 Design Features**

Arizona Public Service Company (APS) is requesting an amendment to Technical Specifications for PVNGS Units 1, 2, and 3. The amendment would, for the most part, adopt the improved Standard Technical Specifications (NUREG-1432) format and content of Section 5.0, "Design Features," as modified by approved changes to the improved Standard Technical Specifications. On March 14, 1995, the NRC issued a License Amendment for the Calvert Cliffs Nuclear Power Plant Units 1 and 2 which is similar to this request.

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 Consideration
- G. Marked-up Technical Specification Change Pages

In accordance with Technical Specification Section 6.5, the Plant Review Board and Offsite Safety Review Committee have reviewed and concur with this proposed amendment. It is requested that this proposed amendment become effective within 45 days of issuance by the NRC. The approved amendment is necessary for Unit 2 to load fuel which is scheduled to begin on April 1, 1996.

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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Proposed Amendment to TS Section 5.0
Page 2

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

Sincerely,

WLS/AKK/JRP/rv




Enclosure

cc: L. J. Callan
K. E. Perkins
B. E. Holian
K. E. Johnston
A. V. Godwin (ARRA)

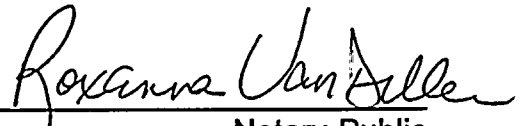
STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, W. L. Stewart, represent that I am Executive Vice President - Nuclear, 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.



W. L. Stewart

Sworn To Before Me This 7 Day Of November, 1995.



Notary Public

My Commission Expires

My Commission Expires June 12, 1997





ENCLOSURE

PROPOSED AMENDMENT TO TECHNICAL SPECIFICATION

SECTION 5.0 DESIGN FEATURES

A. DESCRIPTION OF THE PROPOSED AMENDMENT REQUEST

This Amendment proposes to reformat the current Technical Specifications Section 5.0, Design Features, of the Palo Verde Nuclear Generating Station Units 1, 2, and 3 to be consistent, for the most part, with NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants," Revision 1, dated April 7, 1995. The change would allow the relocation of various sub-sections to other Licensee documents. The relocated sections will retain an appropriate level of regulatory authority and control. The specific changes are as follows:

- 5.1 Site - Figure 5.1-1 is being deleted along with corresponding Section 5.1.1. This figure is contained (Figure 6-4 on page 78) in the Offsite Dose Calculation Manual (ODCM). A description stating the site location, area, and closest distance from the containment building to the exclusion area boundary is proposed in lieu of Figure 5.1-1 (new Section 5.1). This is consistent with NUREG-1432 which indicates that the site shall be described or shown in Figures.
- 5.1.2 Low Population Zone - Figure 5.1-2 is being deleted along with corresponding Section 5.1.2. This figure is contained (Figure 6-6 on page 80) in the ODCM. This is consistent with NUREG-1432. In addition, Chapter 2 of the Updated Final Safety Analysis Report (UFSAR) contains site area maps, minimum distances to site boundary from the containment buildings, and exclusion area authority and control.
- 5.1.3 Gaseous Release Points - Figure 5.1-3 is being deleted along with corresponding Section 5.1.3. This figure is contained (Figure 6-5 on page 79) in the ODCM. This is consistent with NUREG-1432, as it is not included in the Improved Standard Technical Specifications (ISTS).
- 5.2 Containment - This section which includes Sections 5.2.1 and 5.2.2 is being deleted. The design features are located in the PVNGS UFSAR Section 1.2.12.1 and modifications or alterations to this section are controlled by the 10.CFR 50.59 review process. In addition, Technical Specifications Section 3/4.6, Containment Systems, which includes the following: Containment Integrity; Leakage; Air Locks; Internal Pressure; and Structural Integrity and associated Limiting Conditions for Operations (LCO) provide control over changes that would affect containment integrity and any changes to these Technical Specification parameters would be reviewed and approved by the NRC. This change is consistent with NUREG-1432, as it is not included in the STS.

- 5.3 Reactor Core - The information in this section has been modified to be consistent, for the most part, with the example provided in NUREG-1432, including the removal of the fuel enrichment information. The enrichment information is being relocated to revised Sections 5.3.1.1 and 5.3.1.3 of the design features. An additional statement has been included in this section which would allow the use of other cladding material with an approved exemption. This change would allow PVNGS to use other cladding material without also requiring a Technical Specification amendment from the NRC. An exemption to 10 CFR 50.44, 50.46, and Appendix K would be required which would ensure that the NRC approved the use of other cladding material. This Section has been re-numbered 5.2.
- 5.3.2 Control Element Assemblies - This section remains and is re-numbered 5.2.2. This change is consistent with NUREG-1432 except the discussion of control material was not included. This requirement was not included in the revised Technical Specifications because it is currently discussed in the UFSAR, controlled in accordance with 10CFR50.59, and is not a requirement in the current TS.
- 5.4 Reactor Coolant System - This section, including Sections 5.4.1 and 5.4.2, is being deleted. UFSAR Section 4.4.3, Description of the Thermal and Hydraulic Design of the Reactor Coolant System; UFSAR Section 5.2, Integrity of Reactor Coolant Pressure Boundary; CESSAR Section 5.1.1; and Technical Specification Section 3/4.4 adequately control the reactor coolant system parameters, such as; temperature, pressure, and boundary degradation. Either the 10 CFR 50.59 review process or a Technical Specification amendment is necessary to change these documents, respectively. This change is consistent with NUREG-1432.
- 5.5 Meteorological Tower Location - Figure 5.1-1 is being deleted along with corresponding Section 5.5.1. This figure is contained (Figure 6-4 on page 78) in the ODCM. This change is consistent with NUREG-1432.
- 5.6 Fuel Storage - With the exception of changing the paragraph numbers this section is still comprised of criticality, drainage, and capacity sections. The information contained in new Sections 5.3.1.1, 5.3.1.2, and 5.3.1.3 contains Palo Verde plant specific information on the spent fuel storage region and new fuel storage racks. Added to this section is an expansion of the description of the new fuel storage racks. The proposed changes conform, for the most part, with the format of NUREG-1432.

Figure 5.6-1 - This figure remains the same, as it is plant specific information, only the figure number will change to Figure 5.3-1.

- 5.7 Component Cyclic or Transient Limits - The information contained in this section and Tables 5.7-1 and 5.7-2 will be deleted. In addition, the reference to Table 5.7-2 in Technical Specification 4.4.8.2.2 will be deleted. The Component Cyclic or Transient Limits will be relocated to UFSAR Section 3.9.1.1.1, which will ensure that these limits will be adequately controlled under the 10 CFR 50.59 review process. This change is consistent with NUREG-1432.

Plant specific information is provided as necessary in the Design Bases Section and is as follows:

- Section 5.1 contains a description of the site and location of PVNGS.
- Section 5.2 contains the number of fuel assemblies and the number of control element assemblies.
- Section 5.3 contains the fuel enrichment and the center-to-center distance in the new fuel racks and spent fuel racks. Also included in this section is a description of how the spent fuel pool is organized into three regions as shown on Figure 5.3-1, Assembly Burnup Versus Initial Enrichment.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

The required content of Technical Specifications are set forth in 10 CFR 50.36. The regulation requires that the Technical Specifications include items in five specific categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls.

The design features to be included are those features of the facility such as materials of construction and geometric arrangements, which if altered or modified would have a significant effect on safety and are not covered in items (1), (2), and (3) above.

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

The "NRC Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," published on February 6, 1987 (52 FR 3788), proposed criteria for defining the scope of the Technical Specifications. The policy envisioned that many existing Technical Specification requirements could be relocated to other more appropriate programs and documents which would then be controlled by present regulations (e.g., 10 CFR 50.59 and 10 CFR 50.54). The relocation would result in more concise Technical Specifications focusing on safety significant requirements.

Following issuance of the interim Policy Statement, the utility Owners Groups and the NRC staff developed improved Standard Technical Specifications (STS) based on the criteria in the interim Policy Statement for each of the four Nuclear Steam Supply System vendors. In September 1992, five NUREG's were published which contained the improved STS for the four vendors (two NUREG's were for boiling water reactors). NUREG-1432 contains the improved STS for Combustion Engineering Plants. The NUREG placed emphasis on human factors principles to clarify and streamline the STS. On July 22, 1993, the Commission issued a "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (58 FR 39132). The Commission's policy statement described the safety benefits of the improved STS and encouraged licensees to use the improved STS as the basis for plant-specific Technical Specifications.

The proposed amendment would, for the most part, adopt the Improved Standard Technical Specifications (NUREG-1432) in format and content. It would relocate Tables 5.7-1 and 5.7-2 to the UFSAR, and eliminate several sections which are duplicated in other Licensee documents controlled under the 10 CFR50.59 review process or by other Technical Specifications. The design features described in Section 5.3.1 of the current Technical Specifications is being modified to be consistent with NUREG-1432 with the addition of a new provision to allow use of other fuel cladding material without requiring a Technical Specification amendment. This change is being made to support fuel reload in Unit 2 during the Spring 1996 refueling outage. Therefore, it is requested that this amendment be approved by April 1, 1996, to support core reload.

D. SAFETY ANALYSIS OF THE PROPOSED TECHNICAL SPECIFICATION AMENDMENT

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to include Technical Specifications as part of the License. The Commission has provided guidance for the contents of Technical Specifications in its "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (Final Policy Statement), 58 FR 39132, dated July 22, 1993, in which the Commission indicated that compliance with the Final Policy Statement satisfies Section 182a of the Act. In particular, the Commission indicated that certain items could be relocated from the Technical Specifications to licensee controlled documents. The policy statement encouraged licensees to adopt the applicable improved STS.

The proposed amendment reformats the current Technical Specifications Section 5.0, Design Features, in accordance with the improved STS. The proposed change deletes certain figures in this section. These figures are located in an

existing licensee controlled document (ODCM). The ODCM is a Licensee document discussed in Section 6.8 of the PVNGS Technical Specifications. Changes to the ODCM are controlled by the 10 CFR 50.59 review process. Other sections which are to be deleted are either already located in the UFSAR or will be located in the UFSAR upon approval of this amendment request. The containment configuration section (5.2.1) and design pressure and temperature section (5.2.2) is being deleted. This information is located in UFSAR section 1.2.12.1. In addition, sections 5.4.1 and 5.4.2 are also being deleted. This information is located in UFSAR Sections 4.4.3., 5.2, and CESSAR Section 5.1.1. Changes to these sections are controlled by the 10 CFR 50.59 review program and, therefore, are adequately controlled. The remaining changes to this section are consistent for the most part, with the improved STS. Plant specific information is provided where necessary as discussed in Section A of this enclosure.

The proposed changes do not decrease requirements of the design features and an appropriate level of change control will be maintained for relocated requirements so that plant safety remains unaffected. Changes to relocated requirements will be reviewed under the 10 CFR 50.59 review process.

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; 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 amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

The Proposed amendment does not change the Design Features, only relocates the information to other documents. This is consistent with the NRC Policy Statement and NUREG-1432. Therefore, relocating existing information, eliminating information which duplicates information found in other licensee documents, and making administrative improvements provide Technical Specifications which are easier to use. Because information is relocated to established programs where changes to those programs are controlled by regulatory requirements, there is no reduction in commitment and adequate

control is still maintained. Likewise, the elimination of information which duplicates information in other licensee documents, enhances the useability of the Technical Specifications without reducing commitments. The administrative improvements being proposed neither add nor delete requirements, but merely clarify and improve the understanding and readability of the Technical Specifications. Since the requirements remain the same, these changes only affect the method of presentation and are considered administrative, and as such, would not affect possible initiating events for accidents previously evaluated or any system functional requirement.

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

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

The relocation of existing requirements, the elimination of requirements which duplicate existing information, and making administrative improvements are all changes that are administrative in nature. The proposed changes will not affect any plant system or structure, nor will they affect any system functional or operability requirements. Consequently, no new failure modes are introduced as a result of the proposed changes. The proposed changes are consistent with the improved Standard Technical Specifications, for the most part, as plant specific information is included in this section. Therefore, the proposed change would not create the possibility of a new or different type of accident from any accident previously evaluated.

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

The proposed changes are administrative in nature in that no change to the design features of the facility are being made. The Design Features Section is being reformatted to be consistent, for the most part, with NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants," Revision 1. The proposed changes do not affect the UFSAR design bases, accident assumptions, or Technical Specification Bases. In addition, the proposed changes do not affect release limits, monitoring equipment, or practices. Consequently, the proposed changes would not involve a significant reduction in a margin of safety.

F. ENVIRONMENTAL CONSIDERATION

The proposed amendment would, for the most part, adopt the improved Standard Technical Specifications in format and content. The proposed changes do not

decrease requirements of the design features and will continue to provide an appropriate level of change control for relocated requirements so that plant safety remains unaffected. The Technical Specification amendment involves no change in the amount or type of effluent that may be released offsite, and 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 CHANGE PAGES

| <u>Unit 1</u> | <u>Unit 2</u> | <u>Unit 3</u> |
|---------------|---------------|---------------|
| XV | XV | XV |
| XIX | XIX | XIX |
| XXII | XXII | XXII |
| 3/4 4-31 | 3/4 4-31 | 3/4 4-31 |
| 5-1 | 5-1 | 5-1 |
| 5-2 | 5-2 | 5-2 |
| 5-3 | 5-3 | 5-3 |
| 5-4 | 5-4 | 5-4 |
| 5-5 | 5-5 | 5-5 |
| 5-6 | 5-6 | 5-6 |
| 5-6a | 5-6a | 5-6a |
| 5-7 | 5-7 | 5-7 |
| 5-8 | 5-8 | 5-8 |
| 5-9 | 5-9 | 5-9 |
| 5-10 | 5-10 | 5-10 |

