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SUBJECT: Suppl application for amends to Licenses NPF-41,NPF-51 & NPF-74,implementing new Option B to 10CFR50,App J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors."

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Arizona Public Service

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102-03602-WLS/AKK/DRL

February 9, 1996

WILLIAM L. STEWART
EXECUTIVE VICE PRESIDENT
NUCLEAR

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

Reference: Letter No. 102-03567, dated December 19, 1995, from G. R. Overbeck, Vice President - Nuclear Support, APS to USNRC

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS).
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Supplement to Proposed Amendment for the Implementation of
10 CFR Part 50, Appendix J, Option B

The referenced letter requested a change to the PVNGS Technical Specifications for the purpose of implementing the new Option B to 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors." In recent conversations with the Staff, APS and the Staff have agreed to minor revisions to the proposed changes to Surveillance Requirement 4.6.1.3.a, Bases 3/4.6.1.2, and Specification 6.16. Enclosure 1 contains the description and supporting justification for the proposed changes and Enclosure 2 contains the revised pages.

A copy of this letter and its enclosures have been provided to the Arizona Radiation Regulatory Agency pursuant to 10 CFR 50.91(b)(1).

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

Sincerely,

WL Stewart

WLS/AKK/DRL/rv
Enclosures

cc: L. J. Callan (all w/enclosures)
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ENCLOSURE 1

**Supplement to Proposed Amendment
for the Implementation of
10 CFR Part 50, Appendix J, Option B**

A. Description of the Proposed Changes to the Technical Specification Amendment Request

The proposed changes to the Technical Specification amendment request involve Surveillance Requirement 4.6.1.3.a, Bases 3/4.6.2.1, and Specification 6.16. The proposed changes are a result of recent discussions between the Staff and APS. The following changes are proposed:

1. Surveillance Requirement 4.6.1.3.a is revised to read as follows:

Each containment airlock shall be demonstrated OPERABLE:

- a. In accordance with the Containment Leakage Rate Testing Program at periodic intervals and following each closing as specified. The provisions of Specification 4.0.2 are not applicable to the overall airlock leakage test.

NEI 94-01, Section 10.2.2.1, "Containment Airlocks - Test Intervals" provides requirements for airlock testing for periods of multiple containment entries. These requirements will be included in the Containment Leakage Rate Testing Program. The revised wording of the Surveillance Requirement will provide clearer guidance to Operations to consult the Containment Leakage Rate Testing Program for specific requirements for demonstrating airlock operability in these cases. The change eliminates the potential for interpreting the specification as requiring an airlock test following each closing during periods of multiple containment entries.

2. Bases 3/4.6.4.1.2 after "...Part 50" add "and Regulatory Guide 1.163, dated September, 1995."

Specification 6.16 already has committed to Regulatory Guide 1.163 and the additional listing under Bases 3/4.6.1.2 is made for consistency.

3. Specification 6.16 The last paragraph of the proposed Specification which discussed general visual inspections of the containment prior to Type A tests is being deleted.

This requirement will be included in the Containment Leakage Rate Testing Program and, therefore, it is redundant to address it in Section 6.16 as well.

