

**Arizona Public Service Company**

PALO VERDE NUCLEAR GENERATING STATION  
P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

102-03794-JML/AKK/SAB

October 4, 1996

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  
License Amendment Request for Conversion to the Improved Standard  
Technical Specifications (ITS)**

Pursuant to 10 CFR 50.90, Arizona Public Service Company (APS) hereby submits a request to amend Facility Operating Licenses NPF-41, NPF-51 and NPF-74 and associated Technical Specifications (TS) for PVNGS Units 1, 2, and 3, respectively. The proposed amendment would revise the PVNGS TS to be consistent with NUREG 1432, Revision 1, "Standard Technical Specifications Combustion Engineering Plants" and will replace the unit-specific technical specifications for PVNGS Units 1, 2, and 3 with a single set of technical specifications applicable to all three units.

The Enclosure contains the description and justification for the proposed TS amendment. The submittal is designed to facilitate distribution of individual sections for review to the appropriate organizational units within the NRC. Because of the size and complexity of the submittal, the NRC PVNGS Project Manager, Mr. J. W. Clifford, has agreed to distribute the submittal within the NRC. Five copies of the amendment request have been forwarded to him to facilitate distribution of individual sections.

A description of the contents and organization of the submittal is included as Attachments, which are described below:

ATTACHMENT 1 - "PVNGS Units 1, 2, and 3 ITS Submittal Synopsis". This attachment describes the organization and format of the ITS submittal in order to familiarize the reviewers with the layout of each section.

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ATTACHMENT 2 - "Pending PVNGS TS Changes". This attachment lists the TS changes for PVNGS that are currently with or that will be submitted to the NRC for review that have been incorporated into the submittal for the ITS conversion.

ATTACHMENT 3 - "Generic Changes". This attachment lists the TS Task Force (TSTF) generic changes that have been incorporated into the submittal for the PVNGS ITS conversion.

ATTACHMENT 4 - "Current Technical Specification Changes". This attachment lists the changes to parameters and values in the PVNGS CTS that have been included in the scope of this submittal.

The scheduled implementation date of the proposed amendment will be determined upon completion of the PVNGS ITS Implementation Plan. The plan is scheduled to be complete by January 31, 1997 at which time the proposed implementation date will be provided to the NRC. The plan is being developed assuming NRC approval of this amendment request by March 31, 1997.

The implementation of the PVNGS ITS will require the performance of a number of new surveillance requirements. APS intends to treat these new requirements as being "met" at the time of implementation of the ITS. The first actual performance of the surveillance requirements will be scheduled within the specified frequency starting from the date of implementation. For surveillance requirements whose frequency of performance is being extended, the due date for the next performance of the surveillance will be changed to reflect the new required frequency upon implementation.

As identified in Attachment 2, there are 2 items included in the ITS scope which will require future amendment requests separate from this submittal. These amendment requests will be submitted in accordance with the schedule identified in the attachment.

The evaluations contained in individual sections of this amendment request concluded that the proposed changes to the PVNGS Unit 1, 2, and 3 TS's do not involve a significant hazards consideration. In addition, the proposed changes do not create a potential for a significant change in the type or a significant increase in the amount of any effluent that may be released offsite, nor do the changes involve a significant increase in individual or cumulative occupational radiation exposure. As such, operation of PVNGS

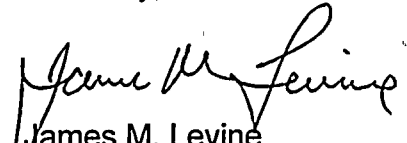
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Units 1, 2, and 3 in accordance with the proposed amendment does not involve an  
unreviewed environmental question.

In accordance with Technical Specification Section 6.5, the Plant Review Board and  
Offsite Safety Review Committee have reviewed and concurred with this request.  
Pursuant to 10 CFR 50.91(b)(1), a copy of this request is being forwarded to the Arizona  
Radiation Regulatory Agency.

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

Sincerely,

  
James M. Levine  
Sr. Vice President, Nuclear


JML/AKK/SAB/dpr  
Enclosure

cc: L. Callan  
K. Perkins  
J. Clifford  
K. Johnston  
A. Godwin  
T. Ryan

(ARRA)  
(Lockheed Idaho Technology Company)


STATE OF ARIZONA       )  
                                  ) s.s.  
COUNTY OF MARICOPA )

I, J. M. Levine, represent that I am Sr. 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, 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 4th Day Of October, 1996



  
\_\_\_\_\_  
Notary Public

My Commission Expires

August 29, 1999

# **ATTACHMENT 1**

## **PVNGS Units 1, 2, and 3 ITS Submittal Synopsis**

### **Part A: Description of Each Document Included in the PVNGS ITS Submittal**

#### **1. Application of the TS Criteria (Split Report)**

This document lists each of the PVNGS CTS's and shows the results of the PVNGS application of 10 CFR 50.36(c)(2)(ii) for retention of requirements in the ITS. For each of the PVNGS CTS's, this document identifies whether or not the requirement is retained in the PVNGS ITS and the basis for its retention or exclusion. For those PVNGS CTS line items that are retained in the PVNGS ITS, the equivalent PVNGS ITS number is listed. For PVNGS CTS line items that did not meet the selection criteria and have not been retained in the PVNGS ITS, a detailed explanation of the application of the selection criteria and justification for relocation is provided. The No Significant Hazards Consideration for the relocation is also provided.

#### **2. PVNGS Units 1, 2, and 3 ITS, Smooth Copy**

This document is the proposed PVNGS ITS and associated Bases. The ITS will be one combined set for all three units at PVNGS.

#### **3. Markup and Exceptions to NUREG 1432, Revision 1**

A copy of the Specification and the Bases for NUREG 1432, Revision 1, has been annotated to indicate deviations between the NUREG and the PVNGS ITS. Justification for the NUREG exceptions are provided for each ITS specification. The annotated copy of the NUREG 1432, Revision 1 and the discussion of the NUREG Exceptions are cross referenced by the use of small "circles" which are sequentially numbered for each ITS Specification.

#### **4. Markup of the CTS and the Discussion of Changes (DOC)**

One combined set of CTS's are marked up to annotate the cross reference to the equivalent PVNGS ITS number showing the disposition of the existing requirements into the PVNGS ITS. The annotated copy of the CTS pages are also marked with sequentially numbered "bubbles" which provide a cross reference to the Discussion of Changes between the CTS and the ITS.

The ITS number is noted on the top right hand corner of each CTS page identifying the ITS LCO where the CTS requirement is located. Items on the CTS page that are located in a different ITS location have the appropriate location noted adjacent to the item. When the ITS requirement differs from the CTS requirement the CTS being revised is annotated with an alpha-numeric

designator. This designator relates to the appropriate DOC. Each DOC provides a description of the requirements and a justification for the change.

When a CTS page contains requirements that are located in more than one ITS specification, the CTS page is marked-up uniquely for each ITS specification. Each marked-up CTS page references each of the ITS specifications where requirements are located.

The alpha-numeric designator used to identify a change in the CTS is based upon the category of the change and a sequential number within that category. The changes to the CTS are categorized as follows:

- A ADMINISTRATIVE - associated with restructuring, interpretations or rearranging of requirements, and other changes that do not revise existing requirements.
- R RELOCATED - specific LCO requirements that do not satisfy the NRC selection criteria stated in 10 CFR 50.36(c)(2)(ii).

#### TECHNICAL CHANGES

- M More Restrictive - proposed changes to the CTS that result in added restrictions or eliminated flexibility.
- L Less Restrictive - proposed changes to the CTS that result in relaxed or eliminated requirements or new flexibility.
- LA Relocations - proposed changes to the CTS that result in the relocation of details from the CTS to a Licensee Controlled Document.
- LB CTS Change - proposed changes to the CTS that revise existing parameters or values in the CTS.

#### 5. No Significant Hazards Consideration (NSHC)

This document provides the assurance, in accordance with 10 CFR 50.92, that the changes do not constitute significant hazard considerations. Generic NSHC are performed for CTS changes categorized as A, R, M and LA. Specific NSHC are performed for CTS changes categorized as L or LB.

## Part B: Description of Each Volume of the PVNGS ITS Submittal

Volume 1	Application of Selection Criteria (Split Report)
Volume 2	PVNGS ITS Chapter 1.0, "Use and Application" PVNGS ITS Chapter 2.0, "Safety Limits" PVNGS ITS Section 3.0, "LCO and SR Applicability"
Volumes 3 & 4	PVNGS ITS Section 3.1, "Reactivity Control"
Volume 5	PVNGS ITS Section 3.2, "Safety Limits"
Volumes 6, 7 & 8	PVNGS ITS Section 3.3, "Instrumentation"
Volumes 9 & 10	PVNGS ITS Section 3.4, "Reactor Coolant System"
Volume 11	PVNGS ITS Section 3.5, "Emergency Core Cooling Systems"
Volume 12	PVNGS ITS Section 3.6, "Containment Systems"
Volumes 13 & 14	PVNGS ITS Section 3.7, "Plant Systems"
Volumes 15 & 16	PVNGS ITS Section 3.8, "Electrical Systems"
Volume 17	PVNGS ITS Section 3.9, "Refueling Operations"
Volume 18	PVNGS ITS Chapter 4.0, "Design Features"
Volume 19	PVNGS ITS Chapter 5.0, "Administrative Control"

The order of the documents within each volume is as follows:

- Smooth Copy of the entire ITS Section or Chapter
- Mark-up and Exceptions to NUREG 1432, Revision 1
- Mark-up of the CTS and the DOC's
- NSHC

## ATTACHMENT 2

### Pending PVNGS TS Changes

The following TS Changes which have been or will be submitted to the NRC have been incorporated into the PVNGS ITS:

- I. Diesel Generators: Compilation of multiple improvements to the TS surveillance requirements including Generic Letter 94-01.  
References:
  1. PVNGS Letter 102-03293 dated March 24, 1995
  2. PVNGS Letter 102-03472 dated September 10, 1995
  3. PVNGS Letter 102-03632 dated March 22, 1996
  
- II. Risk Based TS changes to Safety Injection Tanks, Low Pressure Safety Injection System, and Diesel Generators.  
References:
  1. PVNGS Letter 102-03392 dated June 13, 1995
  2. PVNGS Letter 102-03449 dated August 16, 1995
  
- III. Revise the Pressurizer Pressure Limits and Revise the Definition of Dose Equivalent I-131  
Reference:
  1. PVNGS Letter 102-03717 dated June 17, 1996
  
- IV. Revise the Surveillance Requirement for Trisodium Phosphate (TSP)  
Reference:
  1. PVNGS Letter 102-03727 dated June 28, 1996
  
- V. Revise Technical Specification 3/4.8.1.1, AC Sources Operating  
  
This amendment request proposes to revise CTS Action Statements 3.8.1.1.f and 3.8.1.1.g.  
  
Submittal Date: October 15, 1996
  
- VI. Revise Technical Specification references to peak calculated containment internal pressure from 49.5 psig to 52 psig.  
  
Submittal Date: November 27, 1996



## ATTACHMENT 3

### Generic Changes

The following Technical Specification Task Force (TSTF) Generic Changes were incorporated into the PVNGS ITS Submittal:

- |         |   |
|---------|---|
| TSTF-02 | Relocate the 10 year sediment cleaning of the fuel oil storage tank to licensee control.                  |
| TSTF-17 | Extension of testing frequency of the containment airlock interlock mechanism from 184 days to 24 months. |
| TSTF-20 | Delete extraneous Action from Refueling Cavity Water Level  |
| TSTF-52 | 10 CFR 50 Appendix J Option B   |
| TSTF-58 | Incorporate CE NPSD-995 recommendations into ECCS Specification   |
| TSTF-59 | Incorporate CE NPSD-994 recommendations into SIT Specification  |
| TSTF-60 | Make LCO 3.0.4 applicable to all actions of TS 3.4.15   |
| TSTF-66 | Revise RCS Specific Activity LCO  |
| TSTF-67 | Correction of shutdown margin definition  |
| TSTF-69 | Remove SR 3.3.1.6 from Function 14 and 15 in Table 3.3.1-1  |
| TSTF-70 | Fuel Storage Pool Verification  |
| TSTF-71 | Add example of SFDP to the 3.0.6 Bases  |
| TSTF-72 | Split Function 12 in Table 3.3.1-1 into two functions   |
| TSTF-73 | Indicate that RC Flow - Low, Step allowable value is $\leq [ ]$ psid                                      |
| TSTF-74 | ESFAS Automatic Bypass Removal SR   |
| TSTF-75 | Delete SR 3.1.5.4 from LCO 3.3.3 Action B.2   |
| TSTF-76 | Remove note requiring review by the onsite review committee   |
| TSTF-77 | Add an Action for an adverse condition for LHR and DNBR   |

TSTF-78	Surveillance requirement for ASME Section XI Pumps
TSTF-79	Change Specification 3.3.4 to agree with CEN-327
TSTF-83	LCO 3.3.4 Condition A, Note was made into a second condition
CEOG-47	RCS Maximum flowrate
CEOG-48	Add note to exclude neutron detectors from channel calibration (3.3.11 and 3.3.12)
CEOG-49	Remove note (c) from Table 3.3.1-1
CEOG-50	Remove note (b) from Table 3.3.1-1

## ATTACHMENT 4

### Current Technical Specification Changes

The following lists the changes to the PVNGS CTS that are included within the scope of the PVNGS ITS Submittal:

1. The Maximum Containment Air Temperature is currently specified in the CTS as 120°F. In the ITS, it will be revised to 117°F. The change is a result of incorporating instrument uncertainties.
2. The applicability of the Containment Spray System CTS is currently specified as Modes 1, 2, 3, and 4\* with the asterisk meaning "only when shutdown cooling is not in operation." During the ITS conversion, the applicability will be changed to Modes 1, 2, 3, and 4\* with the asterisk meaning "when RCS pressure is  $\geq 385$  psia." The change is a result of specifying the shutdown cooling entry conditions.
3. The containment spray CTS has a requirement to maintain the spray header piping filled with water to the 115 foot level. In the ITS, it will be revised to specify the 113 foot level. The change is a result of a revised analysis.
4. The allowable pressure drop across the hydrogen purge filtration unit is specified in the CTS as 8.4 inches of water gage. In the ITS, it will be revised to 2.26 inches of water gage. The change is a result of a revised analysis.
5. The frequency for testing the ESFAS subgroup relays is being extended in accordance with CEN-403.
6. The safety injection tank minimum nitrogen cover pressure is currently specified in the CTS as 254 psig. In the ITS conversion, it will be revised to 260 psig. The change is a result of incorporating instrument uncertainties.