

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SUBJECT: Resubmits four license conditions incorporating changes as requested by NRC in 980409 telcon. License conditions supercede license conditions submitted w/util 980327 ltr.

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AAZ



Palo Verde Nuclear
Generating Station

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102-04119-JML/AKK/TNW
May 1, 1998

U. S. Nuclear Regulatory Commission
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Reference: APS Letter 102-04201 dated March 27, 1998 from J. M. Levine to the
NRC, "Improved Technical Specifications – Comments on Draft SE
and Submittal of ITS and Bases"

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Improved Technical Specifications (ITS) - Revised License
Conditions**

In the referenced letter, APS provided the NRC two proposed license conditions related to the conversion of the PVNGS Current Technical Specifications (CTS) to the Improved Technical Specifications (ITS). The referenced letter also separately identified two commitments that are expected to be imposed with the issuance of the PVNGS ITS Safety Evaluation.

A telephone call was held on April 9, 1998 between members of the APS and NRC staff to discuss the proposed license conditions and commitments. In the telephone call, PVNGS agreed to resubmit the license conditions incorporating changes as requested by the NRC. PVNGS also agreed to resubmit the commitments in the form of license conditions. Attached please find four license conditions written as discussed in the April 9, 1998 telephone call. These license conditions supercede the license conditions submitted with the referenced letter. The license conditions show the deletions using a "strikeout" feature and the additions using bolded characters.

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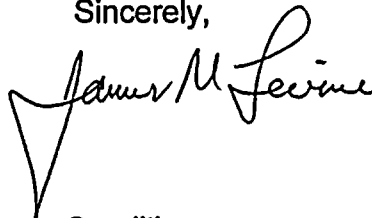


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Improved Technical Specifications - Revised License Conditions
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APS concurs with the addition of a reference to current technical specification Table 3.3-3, item II.B.1 in Discussion of Change Number 3.3.6 M.1 in the "Table of PVNGS More Restrictive Changes (M)." The reference to Table 3.3 should also be changed to Table 3.3-3 for the other entries of the same change. These changes are for reference purposes only and do not alter the scope or content of the change. The above reference changes were discussed on April 23, 1998 with the NRC Project Manager for the PVNGS ITS conversion.

Please contact Mr. Scott Bauer at (602)-393-5978 if you have any questions or would like additional information regarding this matter.

Sincerely,

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

JML/AKK/TNW/

Enclosure 1: Proposed License Conditions

cc: E. W. Merschoff
K. E. Perkins
M. B. Fields
J. H. Moorman
J. N. Donohew
A. V. Godwin



ENCLOSURE NO. 1

LICENSE CONDITIONS



Enclosure 1

Proposed License Conditions

APS requests that the Additional License Conditions 1, 2, 3 and 4 be added to each Appendix D to the Palo Verde Nuclear Generating Station Facility Operating Licenses, No. NPF-41 for PVNGS Unit 1, No. NPF-51 for PVNGS Unit 2, and NPF-74 for Unit 3.

Additional Condition 1

This amendment authorizes the relocation of certain technical specification requirements to licensee-controlled documents. Implementation of this amendment shall include the relocation of these technical specification requirements to the appropriate documents, as described in the Table of PVNGS Relocated Details (LA), **Table of PVNGS Relocated Specifications (R)**, and table XX [the table of quality assurance-related relocations beginning on page 32 of the draft SE] in the Safety Evaluation enclosed with this amendment, as evaluated in the SE.

Implementation Date for Additional Condition 1

The relocation must be completed prior to or upon implementation of this amendment.

For the licensee-controlled documents that require updates to be submitted to the NRC in accordance with regulations or technical specifications, the next required updates after the implementation of this amendment shall contain the changes associated with the relocated technical specifications.



Enclosure 1

Proposed License Conditions (Continued)

Additional Condition 2

For surveillance requirements (SRs) that are new in this amendment, the first performance is due at the end of the first surveillance interval that begins on the date of implementation of this amendment.

For SRs that existed prior to this amendment whose intervals of performance are being reduced, ~~the first performance is due at the end of the first surveillance interval that begins on the date of implementation of this amendment~~—the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.

For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that ~~begins~~ began on the date the surveillance was last performed prior to the date of implementation of this amendment.

For SRs that existed prior to this amendment whose intervals of performance are being extended, ~~the first performance is due at the end of the first surveillance interval that begins on the date the surveillance was last performed prior to the date of implementation of this amendment~~ the first extended surveillance interval began upon completion of the last surveillance performed prior to the implementation of this amendment.

Implementation Date for Additional Condition 2

This additional condition is effective upon implementation of this amendment.



Enclosure 1

Proposed License Conditions (Continued)

Additional Condition 3

PVNGS will add a listing to UFSAR Section 17.2 of the other UFSAR sections outside of UFSAR Chapter 17 containing Quality Assurance Program commitments.

Implementation Date for Additional Condition 3

Additional Condition 3 must be implemented prior to or upon implementation of this amendment.

For the licensee-controlled documents that require updates to be submitted to the NRC in accordance with regulations or technical specifications, the next required update after the implementation of this amendment shall contain the listing of the other UFSAR Sections outside of UFSAR Chapter 17 containing Quality Assurance Program commitments.



Enclosure 1

Proposed License Conditions (Continued)

Additional Condition 4

This amendment authorizes the extension of the surveillance test interval for the engineered safety features actuation system (ESFAS) instrumentation subgroup relays from 62 days to 9 months on a STAGGERED TEST BASIS. Implementation of this amendment shall include that the PVNGS commercial-grade certification program will detect the types of failures that are discussed in References 8, 9, 11, and 12 of the NRC safety evaluation report, dated February 27, 1996, that approved the Combustion Engineering Owners Group Topical Report CEN-403, Revision 1, "ESFAS Subgroup Relay Test Interval Extension."

Implementation Date for Additional Condition 4

This additional condition is effective upon implementation of this amendment.

