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AUTH.NAME AUTHOR AFFILIATION
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SUBJECT: Provides notification that Improved Tech Specs were implemented in PVNGS,Unit 1,2 & 3 on 980813,per OL amend 117.

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APS

Palo Verde Nuclear Generating Station

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102-04172-JML/SAB/GAM
August 25, 1998

U S Nuclear Regulatory Commission
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Reference: Letter dated May 20, 1998, from Jack N. Donohew, NRC, to James M. Levine, APS, "Conversion to Improved Technical Specifications for the Palo Verde Nuclear Generating Station, Unit 1 (TAC No. M96672), Unit 2 (TAC No. M96673), and Unit 3 (TAC No. M96674)

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Docket Nos. STN 50-528/529/530
Implementation of Improved Technical Specifications at PVNGS

In the referenced letter, the NRC issued Amendment No. 117 to Facility Operating License (OL) Nos. NPF-41, NPF-51, and NPF-74, for Palo Verde Nuclear Generating Station (PVNGS), Units 1, 2, and 3, respectively, to convert the current Technical Specifications for PVNGS to the Improved Technical Specifications (ITS). The referenced NRC letter requested that APS submit a letter to the NRC within 14 days of implementing the ITS stating when the ITS were implemented. In accordance with that request, this letter notifies the NRC that ITS (OL Amendment No. 117) were implemented in PVNGS Units 1, 2, and 3 on August 13, 1998.

Amendment No. 117 imposed four license conditions in Appendix D of the PVNGS OLs associated with implementation of ITS. These license conditions have been implemented as required and described below:

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The first license condition required the relocation of certain technical specification requirements to the appropriate documents, as described in Table 3, PVNGS Relocated Details (LA), Table 6, PVNGS Relocated Specifications (R), and Table 5, PVNGS Relocations to the QA Program. These relocations have been completed. The resulting document revisions that require submittal to the NRC will be submitted in accordance with the appropriate requirements (e.g., 10 CFR 50.71[e], TS Bases Control Program, etc.).

The second license condition provided specific provisions for implementing the ITS surveillance requirements. These provisions have been utilized for implementing the ITS surveillance requirements.

The third license condition required a change to the PVNGS Updated Final Safety Analysis Report (UFSAR) to add a listing to UFSAR Section 17.2 of the other UFSAR sections outside of Chapter 17 that contain Quality Assurance Program commitments. This UFSAR change has been completed. The resulting UFSAR revision will be submitted to the NRC in accordance with the required 10 CFR 50.71(e) submittal schedule.

The fourth license condition required that the PVNGS commercial-grade certification will detect the types of failures that are discussed in References 8, 9, 11, and 12 of the 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." This condition has been completed by revising the PVNGS commercial grade dedication program.

No commitments are being made to the NRC by this letter.

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

Sincerely,

Gregg N. Dembek
for JML

JML/SAB/GAM/rlh

cc: E. W. Merschoff
M. B. Fields
J. H. Moorman
A. V. Godwin (ARRA)