

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9810140282	DOC.DATE: 98/10/06	NOTARIZED: YES	DOCKET #
FACIL:STN-50-528	Palo Verde Nuclear Station, Unit 1, Arizona Publi		05000528
STN-50-529	Palo Verde Nuclear Station, Unit 2, Arizona Publi		05000529
STN-50-530	Palo Verde Nuclear Station, Unit 3, Arizona Publi		05000530
AUTH.NAME	AUTHOR AFFILIATION		
LEVINE, J.M.	Arizona Public Service Co. (formerly Arizona Nuclear Power		
RECIP.NAME	RECIPIENT AFFILIATION		
	Records Management Branch (Document Control Desk)		

.SUBJECT: Exigent application for amends to licenses NPF-41,NPF-51 &
 NPF-74,clarifying power level threshold at which certain RPS
 instrumentation trips must be enabled & may be bypassed &
 clarifying that this level is percentage of NF at RTP.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 12 # 6 1
TITLE: OR Submittal: General Distribution

NOTES: STANDARDIZED PLANT
Standardized plant.
Standardized plant.

05000528
05000529
05000530

	RECIPIENT		COPIES			RECIPIENT		COPIES	
	ID CODE/NAME		LTTR	ENCL		ID CODE/NAME		LTTR	ENCL
	PD4-2 LA		1	1		PD4-2 PD		1	1
	FIELDS,M		1	1					
INTERNAL:	ACRS		1	1		ELLE CENTER 01		1	1
	NRR/DE/ECGB/A		1	1		NRR/DE/EMCB		1	1
	NRR/DRCH/HICB		1	1		NRR/DSSA/SPLB		1	1
	NRR/DSSA/SRXB		1	1		NUDOCS-ABSTRACT		1	1
	OGC/HDS2		1	0					
EXTERNAL:	NOAC		1	1		NRC PDR		1	1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTTR 14 ENCL 13

• AA2



10 CFR 50.90
10 CFR 50.91

Palo Verde Nuclear
Generating Station

James M. Levine
Senior Vice President
Nuclear

TEL (602)393-5300
FAX (602)393-6077

Mail Station 7602
P.O. Box 52034
Phoenix, AZ 85072-2034

102-04193-JML/SAB/GAM
October 6, 1998

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
Request for Amendment to Technical Specification (TS) Sections 3.3.1
and 3.3.2, (Under Exigent Circumstances for Unit 3)**

Arizona Public Service Company (APS) requests an editorial amendment to Technical Specifications 3.3.1, "Reactor Protective System (RPS) Instrumentation – Operating," and 3.3.2, "Reactor Protective System (RPS) Instrumentation – Shutdown," under exigent circumstances. The proposed amendment would clarify the power level threshold at which certain RPS instrumentation trips must be enabled and may be bypassed, and clarify that this level is a percentage of the neutron flux at rated thermal power (RTP). The bypass power level, 1E-4% RTP, would be specified as logarithmic power instead of thermal power. The intent of (and the implementation of) the 1E-4% RTP RPS instrumentation bypass threshold level in the Technical Specifications has always been that this power level is neutron power, which would be indicated by logarithmic power, and is not the heat transfer from the reactor core to the coolant, including decay heat, which is the thermal power definition in Technical Specification section 1.1.

This proposed amendment is requested under exigent circumstances for PVNGS Unit 3 in order to support the scheduled startup of the Unit following its current refueling outage. To permit resumption of Unit 3 operation, approval of this amendment would be needed by October 21, 1998, to be effective upon issuance. Since the exigent circumstances do not currently apply to Units 1 and 2, it is expected that the proposed amendment would be processed as non-exigent changes for Units 1 and 2 and issued separately.

The need for this amendment request was identified by an emergency Technical Specification change request submitted to the NRC by Southern California Edison Company for the San Onofre Nuclear Generating Station on September 22, 1998.

102-04193
9810140282 981006
PDR ADOCK 05000528
P PDR

A001

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Request for Amendment to Technical Specification
Page 2

Provided in the enclosure to this letter are the following sections that support the proposed Technical Specification amendment:

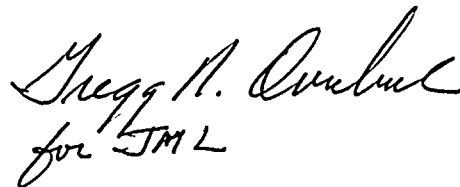
- A. Explanation of the Exigent Circumstances
- B. Description of the Proposed Technical Specification Amendment
- C. Purpose of the Technical Specification
- D. Safety Analysis of the Proposed Technical Specification Amendment
- E. No Significant Hazards Consideration Determination
- F. Environmental Consideration
- G. Marked-up Technical Specification Pages
- H. Re-typed Technical Specification Pages – Unit 3 Amendment Only
- I. Re-typed Technical Specification Pages – Subsequent Amendments to Include Units 1 and 2

In accordance with PVNGS Updated Final Safety Analysis Report, the Plant Review Board and Offsite Safety Review Committee have reviewed and concurred with this proposed amendment. By copy of this letter this request is being forwarded to the Arizona Radiation Regulatory Agency (ARRA) pursuant to 10 CFR 50.91(b)(1).

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

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

Sincerely,



JML/SAB/GAM

Enclosure

cc: E. W. Merschoff (NRC Region IV)
M. B. Fields (NRR Project Manager)
J. H. Moorman (NRC Resident Inspector)
A. V. Godwin (ARRA)

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, G. R. Overbeck, represent that I am Vice President - Nuclear Production, 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.

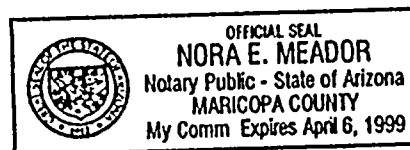
G. R. Overbeck
G. R. Overbeck

Sworn To Before Me This 6 Day Of October, 1998.

Nora E. Meador
Notary Public

My Commission Expires

April 6, 1999





ENCLOSURE

**Request for Amendment to Technical Specification (TS)
Sections 3.3.1 and 3.3.2, Under Exigent Circumstances**

A. EXPLANATION OF THE EXIGENT CIRCUMSTANCES

This exigent situation for Unit 3 exists because the current "THERMAL POWER" and "RATED THERMAL POWER" (RTP) wording in the PVNGS Technical Specifications, when interpreted literally in its application in TS Table 3.3.1-1 footnote (b), could prevent the resumption of operation of the Unit following its current refueling outage. This exigent situation could not have been avoided because, although this wording has existed in the PVNGS TS since initial licensing, it was not identified as a potential source of conflict until APS learned on or about September 24, 1998, of emergency TS amendment requests by Southern California Edison Company, for the San Onofre Nuclear Generating Station, and Entergy Corporation, for the Waterford Nuclear Station.

The literal interpretation of "THERMAL POWER" in TS Table 3.3.1-1 footnote (b) could prevent the return to power operation of a shutdown reactor. This footnote specifies that the local power density (LPD)-high trip and departure from nucleate boiling ratio (DNBR)-low trip may be bypassed when thermal power is less than 1E-4% rated thermal power (RTP), and that the bypass must be automatically removed when thermal power is at or above 1E-4% RTP. Since thermal power, as defined in TS section 1.1, includes decay heat, and decay heat would remain above 1E-4% RTP for a considerable time after shutdown, the literal interpretation of thermal power would effectively prevent the LPD and DNBR trips from being bypassed during a normal outage, which would prevent low power testing and subsequent startup.

B. DESCRIPTION OF THE PROPOSED TECHNICAL SPECIFICATION AMENDMENT

The proposed editorial amendment to the PVNGS Units 1, 2, and 3 Technical Specifications (TS) would replace the words "THERMAL POWER" with "logarithmic power" for the 1E-4% rated thermal power (RTP) level threshold in Table 3.3.1-1 footnotes (a) and (b), surveillance requirement SR 3.3.1.7 Note 2, and Table 3.3.2-1 footnote (d) for the reactor protective system (RPS). The proposed editorial amendment would also replace "RTP" with "NRTP," in Table 3.3.1-1 footnotes (a) and (b), surveillance requirement SR 3.3.1.7 Note 2, and Table 3.3.2-1 footnotes (c) and (d). In addition, the proposed amendment would add a definition for NRTP (nuclear rated thermal power) in section 1.1 as the indicated neutron flux at RTP, and specify NRTP as the "ALLOWABLE VALUE" parameter for the logarithmic power level - high trip in Table 3.3.1-1.

Section G of this enclosure contains Technical Specification pages marked-up to identify these proposed changes. Section G also contains marked-up TS Bases pages for NRC information.



C. PURPOSE OF THE TECHNICAL SPECIFICATION

The purpose of TS 3.3.1, "Reactor Protective System (RPS) Instrumentation – Operating," is to provide for the operability, during plant operation, of instruments necessary to initiate a reactor trip that would protect the plant against anticipated operational occurrences (AOOs) and assist the Engineered Safety Features (ESF) systems in mitigating accidents. Those instruments are specified in Table 3.3.1-1.

The purpose of the logarithmic power level - high trip specified in TS Table 3.3.1-1 is to protect the integrity of the fuel cladding and help protect the reactor coolant pressure boundary in the event of an unplanned criticality from a shutdown condition. The purpose of footnote (a) is to allow the logarithmic power trip to be bypassed when neutron power is above $1\text{E-4}\%$ neutron RTP, and require the trip to be automatically enabled when neutron power is at or below $1\text{E-4}\%$ neutron RTP. This is permitted because the logarithmic power trip is not needed unless neutron power (indicated by logarithmic power) is $1\text{E-4}\%$ neutron RTP or below. As described in the Bases for TS 3.3.1, other trips provide adequate protection for events originating when power is above $1\text{E-4}\%$ RTP.

The purpose of the local power density (LPD) - high and departure from nucleate boiling ratio (DNBR) - low trips in TS Table 3.3.1-1 is to provide plant protection during certain AOOs and assist the ESF systems in the mitigation of certain accidents, as described in the Bases for TS 3.3.1. The purpose of the footnote (b) is to allow the LPD-high and DNBR-low trips to be bypassed when neutron power is below $1\text{E-4}\%$ neutron RTP, and require the trips to be automatically enabled when neutron power (indicated by logarithmic power) is at or above $1\text{E-4}\%$ neutron RTP. This is permitted because, as described in the Bases for TS 3.3.1, plant conditions when power is below $1\text{E-4}\%$ RTP do not warrant the trip protection of these trips.

The purpose of surveillance requirement SR 3.3.1.7 is to require a channel functional test be performed on each RPS channel at a frequency of 92 days to assure that the instruments will be operable. Note 2 allows the functional test of the logarithmic power level channels to be deferred until two hours after reducing power below $1\text{E-4}\%$ RTP, since the logarithmic power trip is not needed unless neutron power (indicated by logarithmic power) is at $1\text{E-4}\%$ neutron RTP or below.

The purpose of Technical Specification 3.3.2, "Reactor Protective System (RPS) Instrumentation – Shutdown," is to provide for the operability, during plant shutdown, of instruments necessary to initiate a reactor trip that would protect the plant against AOOs and assist the ESF systems in mitigating accidents. Those instruments are specified in Table 3.3.2-1.

The purpose of the logarithmic power level - high trip specified in TS Table 3.3.2-1 is to protect the integrity of the fuel cladding and help protect the reactor coolant pressure boundary in the event of an unplanned criticality from a shutdown condition. The purpose of the footnote (d) is to allow the high logarithmic power trip to be bypassed when neutron power is above 1E-4% neutron RTP, and require the trip to be automatically enabled when neutron power is at or below 1E-4% neutron RTP. This is permitted because the logarithmic power trip is not needed unless neutron power (indicated by logarithmic power) is 1E-4% neutron RTP or below.

D. SAFETY ANALYSIS OF THE PROPOSED TECHNICAL SPECIFICATION AMENDMENT

The proposed editorial TS amendment would replace the words "THERMAL POWER" with "logarithmic power" for the 1E-4% RTP level threshold in Table 3.3.1-1 footnotes (a) and (b), surveillance requirement SR 3.3.1.7 Note 2, and Table 3.3.2-1 footnote (d) for the RPS instrumentation. As described above, the purpose of the 1E-4% neutron RTP threshold is to (1) specify the power, below which, the logarithmic power level trip is required to be operable and surveilled, and (2) specify the power, above which, the LPD and DNBR trips are required to be operable. For all of these purposes, the appropriate power threshold should be logarithmic power, which is the power indicated on the logarithmic nuclear instrumentation, and not thermal power. Thermal power is defined in TS section 1.1 as the total reactor heat transfer rate to the reactor coolant, and would include decay heat. Thermal power would therefore not drop to 1E-4% RTP for a considerable period of time after shutdown, and would not provide the plant protective function correlation required at 1E-4% neutron RTP. However, logarithmic power, which measures neutron flux, does provide the plant protective function correlation required at 1E-4% neutron RTP for the required trips as required by safety analyses. The logarithmic power level of 1E-4% neutron RTP nominally correlates to the neutron flux measured by the excore neutron instrumentation that is 1E-4% of the neutron flux at 100% RTP (3876 MWt) measured by the excore neutron instrumentation.

The proposed editorial amendment would also replace "RTP" with "NRTP," in Table 3.3.1-1 footnotes (a) and (b), surveillance requirement SR 3.3.1.7 Note 2, and Table 3.3.2-1 footnotes (c) and (d). A definition would be added for NRTP (nuclear rated thermal power) in section 1.1 as the indicated neutron flux at RTP. These editorial clarifications will reflect the fact that the logarithmic power level of 1E-4% is not a percentage of the "total reactor core heat transfer rate to the reactor coolant of 3876 MWt," as RTP is defined in section TS 1.1, but is instead a percentage of the indicated neutron flux at RTP.

The PVNGS Updated Final Safety Analysis Report (UFSAR) section 7.2.1.1.2.3 states that the excore neutron flux instrumentation provides the input signal to the RPS for the logarithmic power-high trip and to the core protection calculator (CPC) for use in calculations for LPD-high and DNBR-low trips. Further, UFSAR section 15.4.1.3 states that a trip generated at 1E-4% power level (when the CPC bypass is automatically removed) would cause a decrease in fission (neutron) power before the point of adding sensible heat is reached. Also, UFSAR section 15.4.1.4 states that a reactor trip on high logarithmic power is generated before core power reaches the point of adding sensible heat. In all of these sections, it is implicit that the power being described is neutron flux power, as indicated by logarithmic power, and not thermal power, which is defined as heat transfer from the reactor core to the coolant. In addition, the TS Bases for LCO 3.3.1 for the LPD-high trip and the DNBR-low trip state that the 1E-4% RTP threshold level is "sensed by the logarithmic nuclear instrumentation."

The intent of (and the implementation of) the 1E-4% RTP RPS instrumentation bypass threshold level in the Technical Specifications has always been that this power level is neutron power, which would be indicated by logarithmic power, and is not the heat transfer from the reactor core to the coolant, including decay heat, which is the thermal power definition in TS 1.1.

The change to specify NRTP as the "ALLOWABLE VALUE" parameter for the high logarithmic power level trip setpoint in Table 3.3.1-1 will correct the unintended omission of the trip setpoint parameter during preparation of the Improved Technical Specifications. This change will fill in the omitted parameter with the correct parameter of NRTP that is also consistent with the high logarithmic power trip setpoint parameter in Table 3.3.2-1.

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

No. The proposed editorial Technical Specification (TS) amendment would replace the words "THERMAL POWER" with "logarithmic power" for the 1E-4% rated thermal power (RTP) level threshold in Table 3.3.1-1 footnotes (a) and (b), surveillance requirement SR 3.3.1.7 Note 2, and Table 3.3.2-1 footnote (d) for the reactor protective system (RPS) instrumentation. The purpose of the 1E-4% RTP threshold is to (1) specify the power, below which, the logarithmic power level trip is required to be operable and surveilled, and (2) specify the power, above which, the local power density (LPD) and departure from nucleate boiling ratio (DNBR) trips are required to be operable. For these purposes, the appropriate power threshold should be logarithmic power, which is the power indicated on the logarithmic nuclear instrumentation, and not thermal power. Thermal power is defined in TS section 1.1 as the total reactor heat transfer rate to the reactor coolant, and would include decay heat. Thermal power would therefore not drop to 1E-4% RTP for a considerable period of time after shutdown, and would not provide the plant protective function correlation required at 1E-4% neutron RTP. However, logarithmic power, which is indicated by neutron flux, does provide the plant protective function correlation required at 1E-4% neutron RTP for the required reactor trips as required by safety analyses. The logarithmic power level of 1E-4% neutron RTP nominally correlates to the neutron flux measured by the excore neutron instrumentation that is 1E-4% of the neutron flux at 100% RTP (3876 MWt) measured by the excore neutron instrumentation.

The proposed editorial amendment would also replace "RTP" with "NRTP," in Table 3.3.1-1 footnotes (a) and (b), surveillance requirement SR 3.3.1.7 Note 2, and Table 3.3.2-1 footnotes (c) and (d). A definition would be added for NRTP (nuclear rated thermal power) in section 1.1 as the indicated neutron flux at RTP. These editorial clarifications will reflect the fact that the logarithmic power level of 1E-4% is not a percentage of the "total reactor core heat transfer rate to the reactor coolant of 3876 MWt," as RTP is defined in section TS 1.1, but is instead a percentage of the indicated neutron flux at RTP.

An editorial change is also proposed to specify NRTP as the "ALLOWABLE VALUE" parameter for the high logarithmic power level trip setpoint in Table 3.3.1-1 to correct the unintended omission of the trip setpoint parameter during preparation of the Improved Technical Specifications. This change will fill in the omitted parameter with the correct parameter of NRTP that is also consistent with the high logarithmic power trip setpoint parameter in Table 3.3.2-1.

These changes do not constitute a physical change to the Unit or make changes in the RPS instrumentation setpoints, system logic or manual actuation. In addition, these changes do not alter physical plant equipment or the way in which plant equipment is

operated. This change is editorial in that it corrects the TS wording to match the appropriate power parameter that was originally intended and required by safety analyses, and that has been implemented since original licensing of the PVNGS plants. Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

No. The proposed editorial TS amendment would replace the words "THERMAL POWER" with "logarithmic power" for the 1E-4% RTP level threshold in Table 3.3.1-1 footnotes (a) and (b), surveillance requirement SR 3.3.1.7 Note 2, and Table 3.3.2-1 footnote (d) for the RPS instrumentation. The purpose of the 1E-4% RTP threshold is to (1) specify the power, below which, the logarithmic power level trip is required to be operable and surveilled, and (2) specify the power, above which, the LPD and DNBR trips are required to be operable. For these purposes, the appropriate power threshold should be logarithmic power, which is the power indicated on the logarithmic nuclear instrumentation, and not thermal power. Thermal power is defined in TS section 1.1 as the total reactor heat transfer rate to the reactor coolant, and would include decay heat. Thermal power would therefore not drop to 1E-4% RTP for a considerable period of time after shutdown, and would not provide the plant protective function correlation required at 1E-4% neutron RTP. However, logarithmic power, which is indicated by neutron flux, does provide the plant protective function correlation required at 1E-4% neutron RTP for the required reactor trips as required by safety analyses.

The proposed editorial amendment would also replace "RTP" with "NRTP," in Table 3.3.1-1 footnotes (a) and (b), surveillance requirement SR 3.3.1.7 Note 2, and Table 3.3.2-1 footnotes (c) and (d). A definition would be added for NRTP (nuclear rated thermal power) in section 1.1 as the indicated neutron flux at RTP. These editorial clarifications will reflect the fact that the logarithmic power level of 1E-4% is not a percentage of the "total reactor core heat transfer rate to the reactor coolant of 3876 MWt," as RTP is defined in section TS 1.1, but is instead a percentage of the indicated neutron flux at RTP.

An editorial change is also proposed to specify NRTP as the "ALLOWABLE VALUE" parameter for the high logarithmic power level trip setpoint in Table 3.3.1-1 to correct the unintended omission of the trip setpoint parameter during preparation of the Improved Technical Specifications. This change will fill in the omitted parameter with the correct parameter of NRTP that is also consistent with the high logarithmic power trip setpoint parameter in Table 3.3.2-1.

These changes do not constitute a physical change to the Unit or make changes in the RPS instrumentation setpoints, system logic or manual actuation. In addition, these changes do not alter physical plant equipment or the way in which plant equipment is operated. The proposed change does not introduce any new modes of plant operation or new accident precursors. This change is editorial in that it corrects the TS wording to match the appropriate power parameter that was originally intended and required by safety analyses, and that has been implemented since original licensing of the PVNGS plants. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

No. The proposed editorial TS amendment would replace the words "THERMAL POWER" with "logarithmic power" for the $1E-4\%$ RTP level threshold in Table 3.3.1-1 footnotes (a) and (b), surveillance requirement SR 3.3.1.7 Note 2, and Table 3.3.2-1 footnote (d) for the RPS instrumentation. The purpose of the $1E-4\%$ RTP threshold is to (1) specify the power, below which, the logarithmic power level trip is required to be operable and surveilled, and (2) specify the power, above which, the LPD and DNBR trips are required to be operable. For these purposes, the appropriate power threshold should be logarithmic power, which is the power indicated on the logarithmic nuclear instrumentation, and not thermal power. Thermal power is defined in TS section 1.1 as the total reactor heat transfer rate to the reactor coolant, and would include decay heat. Thermal power would therefore not drop to $1E-4\%$ RTP for a considerable period of time after shutdown, and would not provide the plant protective function correlation required at $1E-4\%$ neutron RTP. However, logarithmic power, which is indicated by neutron flux, does provide the plant protective function correlation required at $1E-4\%$ neutron RTP for the required reactor trips as required by safety analyses.

The proposed editorial amendment would also replace "RTP" with "NRTP," in Table 3.3.1-1 footnotes (a) and (b), surveillance requirement SR 3.3.1.7 Note 2, and Table 3.3.2-1 footnotes (c) and (d). A definition would be added for NRTP (nuclear rated thermal power) in section 1.1 as the indicated neutron flux at RTP. These editorial clarifications will reflect the fact that the logarithmic power level of $1E-4\%$ is not a percentage of the "total reactor core heat transfer rate to the reactor coolant of 3876 MWt," as RTP is defined in section TS 1.1, but is instead a percentage of the indicated neutron flux at RTP.

An editorial change is also proposed to specify NRTP as the "ALLOWABLE VALUE" parameter for the high logarithmic power level trip setpoint in Table 3.3.1-1 to correct the unintended omission of the trip setpoint parameter during preparation of the Improved

Technical Specifications. This change will fill in the omitted parameter with the correct parameter of NRTP that is also consistent with the high logarithmic power trip setpoint parameter in Table 3.3.2-1.

These changes do not constitute a physical change to the Unit or make changes in the RPS instrumentation setpoints, system logic or manual actuation. In addition, these changes do not alter physical plant equipment or the way in which plant equipment is operated. This change is editorial in that it corrects the TS wording to match the appropriate power parameter that was originally intended and required by safety analyses, and that has been implemented since original licensing of the PVNGS plants. Therefore, this change does not involve a significant reduction in a margin of safety.

F. ENVIRONMENTAL CONSIDERATION

The proposed editorial TS amendment would replace the words "THERMAL POWER" with "logarithmic power" for the 1E-4% RTP level threshold in Table 3.3.1-1 footnotes (a) and (b), surveillance requirement SR 3.3.1.7 Note 2, and Table 3.3.2-1 footnote (d) for the RPS instrumentation. This change is editorial.

The proposed editorial amendment would also replace "RTP" with "NRTP," in Table 3.3.1-1 footnotes (a) and (b), surveillance requirement SR 3.3.1.7 Note 2, and Table 3.3.2-1 footnotes (c) and (d). A definition would be added for NRTP (nuclear rated thermal power) in section 1.1 as the indicated neutron flux at RTP. These editorial clarifications will reflect the fact that the logarithmic power level of 1E-4% is not a percentage of the "total reactor core heat transfer rate to the reactor coolant of 3876 MWt," as RTP is defined in section TS 1.1, but is instead a percentage of the indicated neutron flux at RTP.

An editorial change is also proposed to specify NRTP as the "ALLOWABLE VALUE" parameter for the high logarithmic power level trip setpoint in Table 3.3.1-1 to correct the unintended omission of the trip setpoint parameter during preparation of the Improved Technical Specifications. This change will fill in the omitted parameter with the correct parameter of NRTP that is also consistent with the high logarithmic power trip setpoint parameter in Table 3.3.2-1.

APS has determined that the proposed amendment involves no changes in the amount or type of effluent that may be released offsite, and results in no increase in individual or cumulative occupational radiation exposure. As described above, the proposed TS amendment involves no significant hazards consideration and, as such, meets the eligibility criteria for categorical exclusion set forth in 10CFR 51.22(c)(9).

