

# CATEGORY 1

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9812220164      DOC. DATE: 98/12/16      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: Application for amends to licenses NPF-41, NPF-51 & NPF-74, changing condition G of TS 3.8.1 to ensure that appropriate actions will be taken to prevent double sequencing of safety-related loads.

DISTRIBUTION CODE: A001D      COPIES RECEIVED: LTTR 1 ENCL 1      SIZE: 15 + 31  
 TITLE: OR Submittal: General Distribution

NOTES: STANDARDIZED PLANT  
       Standardized plant.  
       Standardized plant.

05000528  
 05000529  
 05000530

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD4-2 LA	1 1	PD4-2 PD	1 1
FIELDS, M	1 1		
INTERNAL: ACRS	1 1	<u>FILE CENTER 01</u>	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	NRR/SPSB JUNG, I	1 1
NUDOCS-ABSTRACT	1 1	OGC/HDS2	1 0
EXTERNAL: NOAC	1 1	NRC PDR	1 1

MICROFILMED

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 15 ENCL 14

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

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-37  
Washington, DC 20555-0001

102-04224-JML/SAB/RKR  
December 16, 1998

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)  
3.8.1, AC Sources – Operating and 3.3.7, Diesel Generator  
(DG) – Loss of Voltage Start (LOVS)**

Arizona Public Service Company (APS) requests an amendment to Technical Specification 3.8.1, AC Sources – Operating and 3.3.7, Diesel Generator (DG) – Loss of Voltage Start (LOVS). The proposed amendment will change Condition G of Technical Specification 3.8.1. These changes will ensure that the appropriate actions will be taken to prevent double sequencing of safety-related loads. This change is required to assure the capability of the offsite circuits "to effect a safe shutdown and to mitigate the effects of an accident" as required by Regulatory Guide 1.93. As discussed in the September 16, 1997 meeting with the NRC staff, this Technical Specification amendment will resolve the degraded voltage issue for PVNGS. By this submittal, APS withdraws the Technical Specification amendment request dated November 6, 1996. The revised Technical Specification Bases are also provided (see enclosure 2) in order to facilitate the approval of the Technical Specification changes.

The proposed amendment will also change the setpoint allowable values for the degraded voltage and the loss of voltage relays in Technical Specification Surveillance Requirement SR 3.3.7.3. These changes will ensure that the setpoints reflect the required function of the relays. The revised Technical Specification Bases are also provided (see enclosure 2) in order to facilitate the approval of the Technical Specification changes.

9812220164 981216  
PDR ADOCK 05000528  
P PDR

1/1  
Aool



U. S. Nuclear Regulatory Commission  
Request for Amendment to Technical Specifications  
Page 2

Provided in enclosure 1 to this letter are the following sections which support the proposed Technical Specification amendments:

- A. Description and Safety Analysis of the Proposed Technical Specification Amendment
- B. Purpose of the Technical Specification
- C. Need for the Amendment
- D. No Significant Hazards Consideration Determination
- E. Environmental Consideration
- F. Revised Technical Specification Pages
- G. Retyped Technical Specification Pages

In the September 16, 1997 meeting with the NRC staff, APS committed to review the Updated Final Safety Analysis Report (UFSAR) to verify that it adequately describes the plant as it relates to degraded switchyard voltage and double sequencing. The review of the UFSAR identified changes that are required to ensure that the UFSAR adequately describes the plant as it relates to degraded switchyard voltage and double sequencing. These changes are also provided (see enclosure 3) in order to facilitate the approval of the Technical Specification changes.

In addition, APS committed to analyze the risk impact of the proposed administrative controls and the basis for concluding that PVNGS will be operated in accordance with the regulations with the use of administrative controls as a permanent solution to protect against double sequencing of safety related equipment. As discussed in the September 16, 1997 meeting, APS has determined that the degraded voltage relays can only be credited for undervoltage protection during steady-state conditions. When the voltage is fluctuating, such as during automatic load sequencing following an accident signal, the degraded voltage relays are incapable of anticipating a degraded condition or initiating immediate transfer to the diesel generators if the voltage from the offsite circuits would drop to a degraded level immediately following the accident signal or during sequencing. APS has not been able to identify a practical automatic device that would prevent double sequencing. Since APS cannot identify a practical automatic device to prevent double sequencing and the administrative controls protect against double sequencing of safety related equipment, APS has determined that there is no additional risk associated with the use of administrative controls. Therefore, APS concludes that the administrative controls associated with this Technical Specification change are required to protect the plant against a degraded switchyard/double sequencing condition and to ensure that the plant is operated in accordance with regulations.



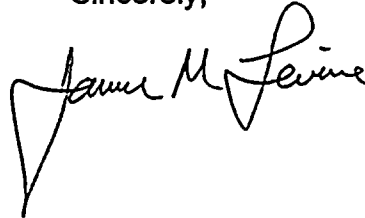
U. S. Nuclear Regulatory Commission  
Request for Amendment to Technical Specifications  
Page 3

In accordance with PVNGS Quality Assurance Program, 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,

A handwritten signature in black ink, appearing to read "James M. Levine". The signature is stylized with a large, sweeping initial "J" and a long, horizontal stroke extending to the right.

JML/SAB/RKR/rh

Enclosures

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

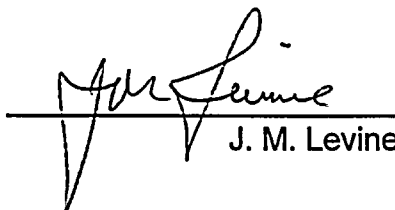
(all w/Enclosure)



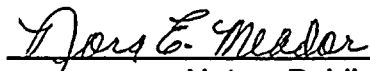


STATE OF ARIZONA       )  
                                  ) ss.  
COUNTY OF MARICOPA   )

I, J. M. Levine, represent that I am Senior Vice President - Nuclear, Arizona Public Service Company (APS), that the foregoing document has been signed by me on behalf of APS with full authority to do so, and that to the best of my knowledge and belief, the statements made therein are true and correct.

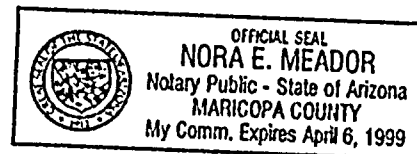
  
J. M. Levine

Sworn To Before Me This 16th Day Of December, 1998.

  
Notary Public

My Commission Expires

April 6, 1999



SECRET