



Palo Verde Nuclear
Generating Station

William E. Ide
Vice President
Nuclear Production

10 CFR 50.90

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102-04831-WEI/TNW/RMW
August 28, 2002

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

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Docket Nos. STN 50-528/529/530
Request for Amendment to Facility Operating Licenses NPF-41, NPF-51 and NPF-74 to Recapture Low-Power Testing Time

Dear Sirs:

Pursuant to 10 CFR 50.90, Arizona Public Service Company (APS) hereby requests an amendment to facility operating licenses NPF-41, NPF-51 and NPF-74 for Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2 and 3, respectively. The proposed amendments would revise the expiration date of each facility operating license to recapture low-power testing time. Specifically, the expiration date of each unit's full-power operating license (FPOL) would be revised such that expiration of the FPOL would occur 40 years from the date of issuance of the FPOL, as permitted by 10 CFR 50.51.

SECY-98-296, "Agency Policy Regarding Licensee Recapture of Low-Power Testing or Shutdown Time for Nuclear Power Plants", dated December 21, 1998, and the associated Commission Voting Record and Staff Requirements Memorandum, dated March 30, 1999, established NRC policy regarding license recapture of low-power testing or shutdown time for nuclear power plants. By establishing this policy, the Commission has acknowledged that recapturing low-power testing time does not involve a significant hazards consideration. The Agency's policy bounds the proposed amendment requests since these amendment requests are similar to the types of license recapture situations that are described in SECY-98-296.

A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance

Callaway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek

A001

U. S. Nuclear Regulatory Commission

Request for Amendment to Facility Operating Licenses NPF-41, NPF-51 and NPF-74 to Recapture Low-Power Testing Time

Page 2

Enclosure 1 provides a notarized affidavit. Enclosure 2 provides a description and evaluation of the proposed amendments. The Attachments provide marked-up and retyped pages of the facility operating licenses. APS requests approval of the proposed amendments by August 31, 2003. Once approved, the proposed amendments shall be implemented within 60 days.

In accordance with the 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 submittal 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 Thomas N. Weber at (623) 393-5764.

Sincerely,



WEI/TNW/RMW/kg

Enclosures:

1. Notarized Affidavit
2. Licensee's Evaluation of the Proposed Amendments

Attachments:

1. Proposed Facility Operating Licenses NPF-41, NPF-51 and NPF-74 Changes (mark-up)
2. Proposed Facility Operating Licenses NPF-41, NPF-51 and NPF-74 Changes (retyped)

cc: E. W. Merschoff [Region IV Administrator] (all w/Attachments)
D. G. Naujock [NRR Project Manager]
N. L. Salgado [Sr. Resident Inspector]
A. V. Godwin [ARRA]

Enclosure 1

Notarized Affidavit

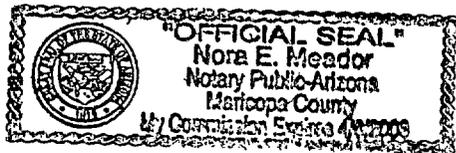
STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, William E. Ide, represent that I am Vice President Nuclear Production, 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.

William E. Ide
William E. Ide

Sworn To Before Me This 28 Day Of August, 2002.

Nora E. Meador
Notary Public



April 16, 2003

Notary Commission Stamp

Enclosure 2

Licensee's Evaluation of the Proposed Amendments

Licensee's Evaluation

Subject: Licensee Recapture of Low-Power Testing Time for Palo Verde Nuclear Generating Station Units 1, 2 and 3, Facility Operating Licenses NPF-41, NPF-51 and NPF-74

1. DESCRIPTION
2. PROPOSED CHANGE
3. BACKGROUND
4. TECHNICAL ANALYSIS
5. REGULATORY ANALYSIS
 - 5.1 No Significant Hazards Consideration
 - 5.2 Applicable Regulatory Requirements/Criteria
6. ENVIRONMENTAL CONSIDERATION
7. REFERENCES
8. PRECEDENT

1.0 DESCRIPTION

This letter is a request to amend Facility Operating Licenses NPF-41, NPF-51 and NPF-74 for Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2 and 3, respectively.

The Code of Federal regulations in 10 CFR 50.51 specifies that a nuclear power plant operating license will be issued for a fixed period of time not to exceed 40 years from the date of issuance. The proposed amendments would revise the facility operating licenses to recover time the units spent in a low-power testing condition before receiving their respective full-power operating licenses (FPOLs). Specifically, the expiration date of each unit's FPOL would be revised such that expiration of the FPOL would occur 40 years from the date of issuance of the FPOL. Although the license recapture time for each unit is relatively small, the proposed amendments when taken collectively would approximately equal one cycle of full power operation. Therefore, issuance of the proposed amendments would provide a substantial economic benefit to the owners of PVNGS. The proposed amendments are not a request for license renewal under 10 CFR 50.54.

2.0 PROPOSED CHANGE

The current expiration date of each facility operating license for PVNGS is based on the issuance of the low-power operating license (LPOL) for each unit. The proposed amendments would revise the expiration date of each facility operating license to coincide with the issuance of each FPOL. Each facility operating license would be revised as follows:

Facility Operating License	Current Expiration	Revised Expiration
NPF-41	December 31, 2024	June 01, 2025
NPF-51	December 09, 2025	April 24, 2026
NPF-74	March 25, 2027	November 25, 2027

In summary, the proposed amendments to the facility operating licenses recapture the time between issuance of the LPOL and FPOL for each PVNGS unit. SECY-98-296, "Agency Policy Regarding Licensee Recapture of Low-Power Testing or Shutdown Time for Nuclear Power Plants", dated December 21, 1998, and the associated Commission Voting Record and Staff Requirements Memorandum (SRM), dated March 30, 1999, established NRC policy regarding license recapture of low-power testing. In the voting record and SRM, the Commission approved the staff's recommendation to allow Grand Gulf Nuclear Station to recover the time spent in low power testing before their FPOL was issued. The Commission also approved the granting of similar requests from other licenses provided that the 40-year license term began with the issuance of an LPOL or construction permit and a separate FPOL was subsequently issued. The 40-year FPOL term for each of the three PVNGS units began with the issuance of the LPOL for the respective unit. Each LPOL was

then superceded by the issuance of a FPOL. Therefore, the FPOL for each PVNGS unit is bounded by the Commission's policy regarding license recapture of low-power testing time.

Aging effects are not safety significant since the license recapture period for each PVNGS unit is short when compared to the overall license period. Therefore, the proposed amendments to the facility operating licenses are administrative in nature and present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

3.0 BACKGROUND

Section 103.c of the Atomic Energy Act of 1954, as amended, provides that a license is to be issued for a specific period not to exceed 40 years. The Code of Federal Regulations (CFR) in 10 CFR 50.51 also specifies that each license will be issued for a fixed period of time not to exceed 40 years from the date of issuance. Also, 10 CFR 50.56 and 50.57 allow the issuance of an operating license pursuant to 10 CFR 50.51 after the construction of the facility has been substantially completed, in conformity with the construction permit and when other provisions specified in 10 CFR 50.57 are met.

The Commission issued the LPOLs for PVNGS Units 1, 2 and 3 on December 31, 1984 (NPF-34), December 09, 1985 (NPF-46) and March 25, 1987 (NPF-65), respectively. In the LPOL for each unit, the licensee was only authorized to operate the respective unit up to 5 percent of rated thermal power.

The Commission superceded the LPOL for each PVNGS Unit by issuing a FPOL, whose expiration date was 40 years from the date of issuance of the LPOL. The table below summarizes these licensing actions:

LPOL	Issued:	FPOL	Issued:	Expires:
NPF-34	December 31, 1984	NPF-41	June 01, 1985	December 31, 2024
NPF-46	December 09, 1985	NPF-51	April 24, 1986	December 09, 2025
NPF-65	March 25, 1987	NPF-74	November 25, 1987	March 25, 2027

The proposed amendments would revise each PVNGS FPOL such that the licenses would expire 40 years from the date of issuance of the respective FPOL.

Although each amendment represents a small increase in the operating license period for each unit, the aggregate impact represents approximately one complete cycle of full power operation for the PVNGS site. Therefore, there is a substantial economic benefit associated with this request.

4.0 TECHNICAL ANALYSIS

The proposed amendments to the facility operating licenses are administrative in nature. The proposed amendments would revise the expiration of each facility operating license such that the expiration of each facility operating license is based upon issuance of the respective FPOL and not upon issuance of the respective LPOL. SECY-98-296, "Agency Policy Regarding Licensee Recapture of Low-Power Testing or Shutdown Time for Nuclear Power Plants", and the associated Commission Voting Record and SRM, dated March 30, 1999, established NRC policy regarding license recapture of low-power testing or shutdown time for nuclear power plants. In the voting record and SRM, the Commission approved the staff's recommendation to allow Grand Gulf Nuclear Station, and similarly situated plants, to recover time spent in low power testing within their FPOL provided a separate FPOL was issued. The granting of the Grand Gulf Nuclear Station amendment for license recapture set a precedent for other similarly situated plants to follow. PVNGS is similarly situated and the proposed amendment requests are bounded by the Agency's policy for recapture of low-power testing time. In addition, aging effects are not safety significant since the license recapture period for each PVNGS unit is short when compared to the overall license period.

Each PVNGS unit was designed and constructed to ensure a 40-year service life. Design features were incorporated that provide for inspectability of structures, systems and components during the 40-year service life. Surveillance, inspectability and maintenance practices which have been implemented in accordance with the American Society of Mechanical Engineers Boiler and Pressure Vessel Code and the unit Technical Specifications provide assurance that any degradation in plant safety-related equipment will be identified and corrected to provide continued safe operation of each unit throughout the duration of the applicable facility operating license.

The largest recapture period requested by the proposed amendment requests is 8 months (Unit 3). This recapture period represents less than 1.7% of the 40-year service life of the respective unit, and is insignificant from an aging effects perspective.

The proposed amendments will not impact the design function, or method of performing or controlling design functions, of structures, systems and components, nor will there be a programmatic effect on various PVNGS programs. As a result, the proposed amendments will not change assumptions, or change, degrade or prevent actions described or assumed in accidents evaluated and described in the PVNGS UFSAR. Therefore, the proposed amendments do not adversely affect nuclear safety or continued safe operation of PVNGS, or result in an increase in the radiological consequences of any accident described in the PVNGS UFSAR.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Consideration

The proposed amendments would revise the expiration of each facility operating license such that the expiration of each facility operating license is based upon issuance of the respective FPOL and not upon issuance of the respective LPOL. As stated previously, SECY-98-296, dated December 21, 1998, and the associated Commission Voting Record and SRM, dated March 30, 1999, established NRC policy regarding license recapture of low-power testing for nuclear power plants. By establishing this policy, the Commission has acknowledged that recapturing low-power testing time does not involve a significant hazards consideration. The Agency's policy bounds the proposed amendment requests since these amendment requests are similar to the types of license recapture situations that are described in SECY-98-296.

APS has evaluated whether or not a significant hazards consideration is involved with the proposed amendments by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment", as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated because they do not involve a change to design configuration or operation of the facilities. In addition, each PVNGS unit was designed and constructed to ensure a 40-year service life. Design features were incorporated that provide for inspectability of structures, systems and components during the 40-year service life. Surveillance, inspectability and maintenance practices which have been implemented in accordance with the American Society of Mechanical Engineers Boiler and Pressure Vessel Code and the unit Technical Specifications provide assurance that any degradation in plant safety-related equipment will be identified and corrected to provide continued safe operation of each unit throughout the duration of the applicable facility operating license.

The largest recapture period requested by the proposed amendment requests is 8 months (Unit 3). This recapture period represents less than 1.7% of the 40-year service life of the respective unit, and is insignificant from an aging effects perspective. Therefore, the proposed amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No

The proposed amendments would revise the expiration of each facility operating license such that the expiration of each facility operating license is based upon issuance of the respective FPOL and not upon issuance of the respective LPOL. No physical changes are being made to the design features or operation of the facilities. Therefore, the proposed amendments do not create the possibility of a new or different kind of accident from any previously evaluated.

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

Response: No

The proposed amendments would revise the expiration of each facility operating license such that the expiration of each facility operating license is based upon issuance of the respective FPOL and not upon issuance of the respective LPOL. No physical changes are being made to the design features or operation of the facilities.

Margin of safety is associated with confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant system pressure boundary and the containment structure) to limit the radiological dose to the public and control room operators in the event of an accident. The proposed amendments to the facility operating licenses are administrative in nature and have no impact on the margin of safety and robustness provided in the design and construction of the facilities. In addition, the proposed amendments will not relax any of the criteria used to establish safety limits, nor will the proposed amendments relax safety system settings or limiting conditions of operation as defined in the Technical Specifications. Therefore, the proposed amendments do not result in a significant reduction in the margin of safety.

Based on the above information, APS concludes that the proposed amendments present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

The following regulations apply to the proposed amendments:

10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review".

10 CFR 50.90, "Application for amendment of license or construction permit".

10 CFR 50.92, "Issuance of amendment".

The following NRC documents apply to proposed amendments:

SECY-98-296, "Agency Policy Regarding Licensee Recapture of Low-Power Testing or Shutdown Time for Nuclear Power Plants".

Commission Voting Record dated March 30, 1999 regarding SECY-98-296.

Analysis

SECY-98-296, dated December 21, 1998, and the associated Commission Voting Record and SRM, dated March 30, 1999, established NRC policy regarding license recapture of low-power testing or shutdown time for nuclear power plants. By establishing this policy, the Commission has acknowledged that recapturing low-power testing time does not involve a significant hazards consideration. The Agency's policy bounds the proposed amendment requests since these amendment requests are similarly situated to that described in the SECY.

The proposed amendments revise the expiration of each facility operating license such that the expiration of each facility operating license is based upon issuance of the respective FPOL and not upon issuance of the respective LPOL. No physical changes are being made to the design features or operation of the facilities. The proposed amendments will not impact the design function, or method of performing or controlling design functions of structures, systems and components, nor will there be a programmatic effect on various PVNGS programs. As a result, the proposed amendments will not change assumptions, or change, degrade or prevent actions described or assumed in accidents evaluated and described in the PVNGS UFSAR. Therefore, the proposed amendments do not adversely affect nuclear safety or continued safe operation of PVNGS, or result in an increase in the radiological consequences of any accident described in the PVNGS UFSAR.

In conclusion, based on the considerations described above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and security, or to the health and safety, of the public.

6.0 ENVIRONMENTAL CONSIDERATION

APS has determined that the proposed amendments do not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendments meet the eligibility criteria for categorical exclusion as set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the proposed amendments.

7.0 REFERENCES

10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review".

10 CFR 50.90, "Application for amendment of license or construction permit".

10 CFR 50.92, "Issuance of amendment".

SECY-98-296, "Agency Policy Regarding Licensee Recapture of Low-Power Testing or Shutdown Time for Nuclear Power Plants".

Commission Voting Record dated March 30, 1999 regarding SECY-98-296.

8.0 PRECEDENT

Palisades, amendment to revise the expiration date of the facility operating license, ADAMS Accession Number 003777442.

San Onofre Nuclear Generating Station, Units 2 and 3, amendments to revise the expiration date of the facility operating licenses, ADAMS Accession Number 003690021.

Dresden, Unit 2, amendment to revise the expiration date of the facility operating license, ADAMS Accession Number 003744786.

Grand Gulf, Unit 1, amendment to revise the expiration date of the facility operating license, ADAMS Accession Number 9905040242.

Diablo Canyon, Units 1 and 2, amendments to revise the expiration date of the facility operating licenses, record number 33196.

Attachment 1

**Proposed Facility Operating Licenses
NPF-41, NPF-51 and NPF-74 Changes (mark-up)**

- F. Except as otherwise provided in the Technical Specifications or the Environmental Protection Plan, APS shall report any violations of the requirements contained in Section 2.C of this license in the following manner: Initial notification shall be made within 24 hours in accordance with the provisions of 10 CFR 50.72 with written follow-up within 30 days in accordance with the procedures described in 10 CFR 50.73(b), (c) and (e);
- G. The licenses shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims; and
- H. This license is effective as of the date of issuance and shall expire at midnight on ~~December 31, 2024~~ June 01, 2025.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed By

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosures:

1. Attachment 1 - [Requirements for Initial Mode 1 Entry] - Deleted
2. Attachment 2 - [Operating Staff Experience Requirements] - Deleted
3. Attachment 3 - [Emergency Response Capabilities] - Deleted
4. Appendix A -
Technical Specifications
5. Appendix B -
Environmental Protection Plan
6. Appendix C -
Antitrust Conditions
7. Appendix D - [Additional Conditions] - Deleted

Date of Issuance: June 1, 1985

- G. The licensees shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims; and
- H. This license is effective as of the date of issuance and shall expire at midnight on ~~December 9, 2025~~ April 24, 2026.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed By

Darrell G. Eisenhut, Acting Director
Office of Nuclear Reactor Regulation

Attachments:

1. [Requirements for Initial Mode 1 Entry] - Deleted
2. [Schedule for NUREG-0737, Sup. 1, Requirement (SPDS)] - Deleted
3. Appendix A -
 Technical Specifications
4. Appendix B
 Environmental Protection Plan
5. Appendix C
 Antitrust Conditions
- 6 Appendix D - [Additional Conditions] - Deleted

Date of Issuance: April 24, 1986

Verde Nuclear Station Physical Security Plan," with revisions submitted through March 18, 1997; and "Palo Verde Nuclear Generating Station Guard Training and Qualification Plan," with revisions submitted through December 26, 1987. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

- F. APS shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety analysis Report for the facility, as supplemented and amended, and as approved in the SER through Supplement 11, subject to the following provision:

APS may make changes to the approved fire protection program without approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- G. Except as otherwise provided in the Technical Specifications or the Environmental Protection Plan, APS shall report any violations of the requirements contained in Section 2.C of this license in the following manner: Initial notification shall be made within 24 hours to the NRC Operations Center via the Emergency Notification System, with written follow-up within 30 days in accordance with the procedures described in 10 CFR 50.73(b), (c), and (e);
- H. The licensees shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims; and
- I. This license is effective as of the date of issuance and shall expire at midnight on ~~March 25~~November 25, 2027.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed By

Thomas E. Murley, Director
Office of Nuclear Reactor Regulation

Attachments:

1. [Requirements for Initial Mode 1 Entry] - Deleted
2. Appendix A -
 Technical Specifications
3. Appendix B -
 Environmental Protection Plan
4. Appendix C -
 Antitrust Conditions
5. Appendix D - [Additional Conditions] - Deleted

Date of Issuance: November 25, 1987

Amendment No. ~~83, 87, 128~~ _____ |

Attachment 2

**Proposed Facility Operating Licenses
NPF-41, NPF-51 and NPF-74 Changes (retyped)**

- F. Except as otherwise provided in the Technical Specifications or the Environmental Protection Plan, APS shall report any violations of the requirements contained in Section 2.C of this license in the following manner: Initial notification shall be made within 24 hours in accordance with the provisions of 10 CFR 50.72 with written follow-up within 30 days in accordance with the procedures described in 10 CFR 50.73(b), (c) and (e);
- G. The licenses shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims; and
- H. This license is effective as of the date of issuance and shall expire at midnight on June 01, 2025.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed By

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosures:

1. Attachment 1 - [Requirements for Initial Mode 1 Entry] - Deleted
2. Attachment 2 - [Operating Staff Experience Requirements] - Deleted
3. Attachment 3 - [Emergency Response Capabilities] - Deleted
4. Appendix A -
 Technical Specifications
5. Appendix B -
 Environmental Protection Plan
6. Appendix C -
 Antitrust Conditions
7. Appendix D - [Additional Conditions] - Deleted

Date of Issuance: June 1, 1985

- G. The licensees shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims; and
- H. This license is effective as of the date of issuance and shall expire at midnight on April 24, 2026.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed By

Darrell G. Eisenhut, Acting Director
Office of Nuclear Reactor Regulation

Attachments:

- 1. [Requirements for Initial Mode 1 Entry] - Deleted
- 2. [Schedule for NUREG-0737, Sup. 1, Requirement (SPDS)] - Deleted
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- 6 Appendix D - [Additional Conditions] - Deleted

Date of Issuance: April 24, 1986

Verde Nuclear Station Physical Security Plan," with revisions submitted through March 18, 1997; and "Palo Verde Nuclear Generating Station Guard Training and Qualification Plan," with revisions submitted through December 26, 1987. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

- F. APS shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety analysis Report for the facility, as supplemented and amended, and as approved in the SER through Supplement 11, subject to the following provision:

APS may make changes to the approved fire protection program without approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- G. Except as otherwise provided in the Technical Specifications or the Environmental Protection Plan, APS shall report any violations of the requirements contained in Section 2.C of this license in the following manner: Initial notification shall be made within 24 hours to the NRC Operations Center via the Emergency Notification System, with written follow-up within 30 days in accordance with the procedures described in 10 CFR 50.73(b), (c), and (e);
- H. The licensees shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims; and
- I. This license is effective as of the date of issuance and shall expire at midnight on November 25, 2027.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed By

Thomas E. Murley, Director
Office of Nuclear Reactor Regulation

Attachments:

1. [Requirements for Initial Mode 1 Entry] - Deleted
2. Appendix A -
 Technical Specifications
3. Appendix B -
 Environmental Protection Plan
4. Appendix C -
 Antitrust Conditions
5. Appendix D - [Additional Conditions] - Deleted

Date of Issuance: November 25, 1987

Amendment No. ____ |