



A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear
Generating Station

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102-06042-DCM/SAB/DLK
August 03, 2009

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
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
Correction to Amendment Request for Adoption of TSTF-511,
Revision 0, "Eliminate Working Hour Restrictions from Technical
Specification 5.2.2 to Support Compliance with 10 CFR Part 26"**

By letter no. 102-06011, dated May 28, 2009 (Agencywide Document Access and Management System [ADAMS] Accession No. ML091560229), Arizona Public Service Company (APS) submitted a request for an amendment to the Technical Specifications for PVNGS Units 1, 2, and 3 to delete portions of Technical Specifications superseded by 10 CFR Part 26, Subpart I. APS subsequently determined that a correction to the original License Amendment Request was necessary in Technical Specification 5.2.2. Specifically, a reference in Technical Specification section 5.2.2.b was corrected to reflect the re-numbering of section 5.2.2.f to section 5.2.2.e.

APS is providing corrected marked-up Technical Specification pages (Attachment 1) and the retyped Technical Specification page (Attachment 2). This change is editorial and, therefore, the No Significant Hazards Consideration Determination provided in the original amendment request remains valid and is not changed by this correction.

This letter contains no regulatory commitments.

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

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Page 2

Should you need further information regarding this amendment request, please contact Russell A. Stroud, Licensing Section Leader, at (623) 393-5111.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8/3/09
(Date)

Sincerely,



DMC/RAS/DLK/

Attachments:

1. Updated Marked-up Technical Specification Pages
2. Retyped Technical Specification Page 5.2-2

cc: E. E. Collins Jr. NRC Region IV Regional Administrator
J. R. Hall NRC NRR Project Manager
R. I. Treadway NRC Senior Resident Inspector for PVNGS
A. V. Godwin Arizona Radiation Regulatory Agency (ARRA)
T. Morales Arizona Radiation Regulatory Agency (ARRA)

Attachment 1

Updated Marked-up Technical Specification Pages

5.2-2

5.2-3

5.2 Organization

5.2.2 Unit Staff (continued)

shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4.

- b. Shift crew composition shall meet the requirements stipulated herein and in 10 CFR 50.54(m). Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.f ~~e~~ for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- c. A Radiation Protection Technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- d. ~~Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed SROs, licensed ROs, radiation protection technicians, auxiliary operators, and key maintenance personnel).~~

~~The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.~~

~~Any deviation from the working hour guidelines shall be authorized in advance by personnel at the Director level or designees, in accordance with approved administrative procedures and with documentation of the basis for granting the deviation.~~

~~Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by these authorized individuals or designees to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.~~

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

- de. The Operations Department Leader or Operations Supervisor shall hold an SRO license.
 - ef. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
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Attachment 2

Retyped Technical Specification Page 5.2-2

5.2 Organization

5.2.2 Unit Staff (continued)

shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4.

- b. Shift crew composition shall meet the requirements stipulated herein and in 10 CFR 50.54(m). Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.e for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
 - c. A Radiation Protection Technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
 - d. The Operations Department Leader or Operations Supervisor shall hold an SRO license.
 - e. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
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