

DRAFT REQUEST FOR ADDITIONAL INFORMATION

ARIZONA PUBLIC SERVICE COMPANY, ET. AL.

PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3

DOCKET NOS. STN 50-528, 50-529, AND 50-530

LICENSE AMENDMENT REQUEST

TO CHANGE THE TECHNICAL SPECIFICATIONS TO SUPPORT CREDITING AN EXISTING

MANUAL OPERATOR ACTION TO ISOLATE THE REFUELING WATER TANK (RWT)

TAC NOS. ME2842, ME2843, AND ME2844

By letter dated November 30, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML093450485), Arizona Public Service Company (APS) submitted a license amendment request for the Palo Verde Nuclear Generating Station (PVNGS), Units 1, 2, and 3.

The proposed amendment would revise Technical Specification (TS) Table 3.3.5-1, "Engineered Safety Features Actuation System Instrumentation," to increase the RWT low-level setpoint for the Recirculation Actuation Signal (RAS); and TS Figure 3.5.5-1, "Minimum Required RWT Volume," to increase the minimum volume in the RWT; and would also change the plant licensing basis to allow credit for an existing manual operator action to isolate the RWT in order to preclude the potential for air entrainment from the RWT following an RAS.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the information provided and determined that the additional information specified below is needed for the staff to complete its evaluation of the license amendment request (LAR).

1. Because PVNGS is a three-unit facility that shares common TS pages and implementation of the TS changes for each of these units will be completed over time as the associated modifications are completed, care must be taken to clearly identify the applicable revision of TS for each plant. The stated format of this change will be to add additional TS pages in support of the proposed amendment. The additional pages for the "After RWT TS setpoint change" will be applicable for the Units that have implemented the proposed changes contained in the APS submittal. The current TS pages will be revised to indicate that they are the "Pre-RWT TS setpoint changes" and will continue to be applicable for Units with the existing RWT setpoints. TS Bases pages will also be changed to reflect the Pre-RWT and After RWT setpoint changes. When the three units have implemented the proposed changes contained in this submittal, APS plans to submit a license amendment request to remove the pages related to the Pre-RWT TS setpoint changes that no longer apply. From the submittal, it appears that there will not be any cues provided on the "Pre-RWT" pages or the "After RWT" pages to allow easy determination of whether the pages are applicable or not. The proposed page footers do not help in determining applicability and may just add confusion. Also, there is no confirmatory action to determine whether the RWT setpoint changes have been implemented and Operations accepted, i.e. whether the Pre-RWT or the After RWT pages are applicable. **How will the applicability of the "Pre-RWT" pages versus the "After RWT" pages be clearly communicated to plant personnel?**

2. In the LAR, the licensee stated that the impacts of the increased RAS setpoint and associated Allowable Values and minimum RWT water volume on RWT design functions were evaluated. **a) Were any changes to the operator interface identified, e.g., display banding, range expansion, control type, annunciator setpoints, or other control or display characteristics? b) Are any Safety Parameter Display System (SPDS) displays affected? c) Please list all identified changes to the control room, emergency operating procedures (EOPs), and SPDS not previously identified in your submittal.**
3. **Will any changes to the simulator be required to support the proposed TS changes? If so, how will the sequencing of the proposed changes to the simulator vis-à-vis training for all three plants be addressed?**
4. The licensee stated that the “emergency operating procedures (EOP) are an integral part of the licensed operator qualification and requalification training programs. The action to close these valves after a RAS already exists in the EOPs, but the proposed change credits this task as time-critical. To ensure completion of the task within the allotted time, the EOPs will be modified to: (a) include a note that the action to close valves CH-530 and CH-531 after RAS is a time-critical step; and (b) re-sequence the actions after RAS to isolate the RWT sooner. Changes to the EOPs will be communicated to PVNGS plant operators and appropriate training will be provided.” Given that each unit will implement this TS change at a different time in plant life, **how will the EOP revisions and supporting training be sequenced to assure that each/all plant staff has adequate, timely training?**
5. **Please provide a copy of the Note that has been proposed to be added to the EOPs to cue the operators that the isolation of the RWT is a time-critical task. Preferably, this should be in the form of a marked-up page, or a page from the clean final draft.**
6. **Please provide a copy of PVNGS Engineering Study 13-MS-B094, Revision 0, "Operator Action Time for RWT Isolation After RAS," dated October 9, 2009.**