



A subsidiary of Pinnacle West Capital Corporation

10 CFR 50.90

Palo Verde Nuclear
Generating Station

Dwight C. Mims
Vice President
Regulatory Affairs and Plant Improvement

Tel. 623-393-5403
Fax 623-393-6077

Mail Station 7605
P. O. Box 52034
Phoenix, Arizona 85072-2034

102-06180-DCM/DLK
April 29, 2010

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
Application for Technical Specification Change TSTF-491, Removal
of the Main Steam and Main Feedwater Valve Isolation Times from
Technical Specifications Using the Consolidated Line Item
Improvement Process**

In accordance with the provisions of 10 CFR 50.90, Arizona Public Service Company (APS) is submitting a request for an amendment to the Technical Specifications (TS) for PVNGS Units 1, 2, and 3.

The proposed amendment would modify the TS by removing the specific isolation time for the Main Steam and Main Feedwater isolation valves from the associated PVNGS TS Surveillance Requirements.

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-491, Revision 2, "Removal of the Main Steam and Main Feedwater Valve Isolation Times from Technical Specifications." The availability of this TS improvement was announced in the Federal Register on December 29, 2006 (71 FR 78472) as part of the Consolidated Line Item Improvement Process (CLIIP).

Enclosure 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Enclosure 2 provides the existing TS pages marked up to show the proposed change. Enclosure 3 provides revised (clean) TS pages. Enclosure 4 provides the existing TS Bases pages marked up to show the proposed change (for information only).

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ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Application for Technical Specification Change TSTF-491, Removal of the Main Steam
and Main Feedwater Valve Isolation Times from Technical Specifications Using the
Consolidated Line Item Improvement Process
Page 2

APS requests approval of the proposed license amendment by December 31, 2010,
with the amendment being implemented within 90 days.

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

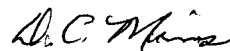
In accordance with the PVNGS Quality Assurance Program, the Plant Review Board
and the Offsite Safety Review Committee have reviewed and concurred with this
proposed amendment. By copy of this letter, this submittal is being forwarded to the
Arizona Radiation Regulatory Agency (ARRA) pursuant to 10 CFR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

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 4/29/10
(Date)

Sincerely,



DMC/RAS/DLK

Enclosures:

1. Description and Assessment
2. Proposed Technical Specification Changes
3. Revised Technical Specification Pages
4. Marked up Existing TS Bases Changes

cc:	E. E. Collins Jr.	NRC Region IV Regional Administrator
	J. R. Hall	NRC NRR Project Manager
	L. K. Gibson	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)

Enclosure 1

Description and Assessment

Subject: Application for Technical Specification Change TSTF-491, Removal of the Main Steam and Main Feedwater Valve Isolation Times from Technical Specifications Using the Consolidated Line Item Improvement Process

1.0 DESCRIPTION

2.0 ASSESSMENT

2.1 Applicability of TSTF 491 and Published Safety Evaluation

2.2 Optional Changes and Variations

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

3.2 Verification and Commitments

4.0 ENVIRONMENTAL EVALUATION

5.0 REFERENCES

1.0 DESCRIPTION

The proposed amendment would modify Technical Specifications (TS) by removing the specific isolation time for the Main Steam and Main Feedwater isolation valves from the associated Standard Technical Specifications (STS) Surveillance Requirements (SRs).

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) TSTF-491 Revision 2. The availability of this TS improvement was published in the Federal Register on December 29, 2006 (71 FR 78472) as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of TSTF-491 and Published Safety Evaluation

Arizona Public Service Company (APS) has reviewed TSTF-491 (Reference 1), and the NRC model Safety Evaluation (SE) (Reference 2) as part of the CLIIP. APS has concluded that the information in TSTF-491, as well as the SE prepared by the NRC staff, are applicable to Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2, and 3 and justify this amendment for the incorporation of the changes to the PVNGS TS.

2.2 Optional Changes and Variations

APS is not proposing any deviations from the TS changes described in TSTF-491 or the NRC staff's model SE published in the Federal Register on October 5, 2006 (71 FR 58884).

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

APS has reviewed the proposed No Significant Hazards Consideration Determination (NSHCD) published in the Federal Register as part of the CLIIP. APS has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to PVNGS Units 1, 2, and 3 and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register on December 29, 2006 for this TS improvement, plant-specific verifications were performed as follows:

A review was performed of the affected systems as described in the Updated Final Safety Analysis Report to verify that TSTF-491 was applicable to PVNGS Units 1, 2, and 3.

In addition, APS has proposed TS Bases consistent with TSTF-491 which provide guidance and details on how to implement the new requirements. Finally, APS has a Bases Control Program consistent with Section 5.5 of the STS.

4.0 ENVIRONMENTAL EVALUATION

The amendment changes requirements with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment adopting TSTF-491; Rev 2, involves no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that TSTF-491, Rev 2, involves no significant hazards considerations, and there has been no public comment on the finding in Federal Register Notice 71 FR 58884, October 5, 2006. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 REFERENCES

1. TSTF-491, Revision 2, "Removal of Main Steam and Main Feedwater Valve Isolation Times from Technical Specifications."
2. NRC Model Safety Evaluation Report published on October 5, 2006 (71 FR 58884).

Enclosure 2

Proposed Technical Specification Changes

Markup of Pages:

3.7.2-3

3.7.3-2

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.2.1 -----NOTE----- Not required to be performed prior to entry into MODE 3. -----</p> <p>Verify closure time of each MSIV is ≤ 4.6 seconds <u>within limits</u> with each actuator train on an actual or simulated actuation signal.</p>	<p>In accordance with the Inservice Testing Program</p>

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3.	6 hours
	C.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.3.1 Verify the closure time of each MFIV is ≤ 9.6 seconds <u>within limits</u> on an actual or simulated actuation signal.	In accordance with the Inservice Testing Program

Enclosure 3

Revised Technical Specification Pages

Page:

3.7.2-3

3.7.3-2

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.2.1 -----NOTE----- Not required to be performed prior to entry into MODE 3. ----- Verify closure time of each MSIV is within limits with each actuator train on an actual or simulated actuation signal.</p>	<p>In accordance with the Inservice Testing Program</p>

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3.	6 hours
	C.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.3.1 Verify the closure time of each MFIV is within limits on an actual or simulated actuation signal.	In accordance with the Inservice Testing Program

Enclosure 4

Marked up Existing TS Bases Changes

Pages:

B 3.7.2-8

B 3.7.2-9

B 3.7.3-5

BASES (continued)

ACTIONS
(continued)H.1 and H.2 (continued)

The 4 hour Completion Time is consistent with that allowed in Condition F.

Inoperable MSIVs that cannot be restored to OPERABLE status within the specified Completion Time, but are closed, must be verified on a periodic basis to be closed. This is necessary to ensure that the assumptions in the safety analysis remain valid. The 7 day Completion Time is reasonable, based on engineering judgment, MSIV status indications available in the control room, and other administrative controls, to ensure these valves are in the closed position.

I.1 and I.2

If the MSIVs cannot be restored to OPERABLE status, or closed, within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours.

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from MODE 2 conditions in an orderly manner and without challenging unit systems.

SURVEILLANCE
REQUIREMENTSSR 3.7.2.1

This SR verifies that the closure time of each MSIV is ≤ 4.6 seconds within the limit given in Reference 5 with each actuator train on an actual or simulated actuation signal. ~~The MSIV closure time is~~ and is within that assumed in the accident and containment analyses. ~~This SR also verifies the valve closure time is in accordance with the Inservice Testing Program.~~ This SR is normally performed upon returning the unit to operation following a refueling outage. The MSIVs should not be full stroke tested at power.

(continued)

BASES (continued)

SURVEILLANCE
REQUIREMENTS
(continued)SR 3.7.2.1 (continued)

The Frequency for this SR is in accordance with the Inservice Testing Program. This Frequency demonstrates the valve closure time at least once per refueling cycle.

This test is conducted in MODE 3, with the unit at operating temperature and pressure, as discussed in the Reference ~~5~~ 6 exercising requirements. This SR is modified by a Note that allows entry into and operation in MODE 3 prior to performing the SR. This allows a delay of testing until MODE 3, in order to establish conditions consistent with those under which the acceptance criterion was generated.

REFERENCES

1. UFSAR, Section 10.3.
2. CESSAR, Section 6.2.
3. UFSAR, Section 15.1.5.
4. 10 CFR 100.11.
5. ~~ASME, Boiler and Pressure Vessel Code, Section XI, Inservice Inspection, Article IWV-3400. UFSAR, Section 5.1.5.~~
6. ~~ASME, Boiler and Pressure Vessel Code, Section XI, Inservice Inspection, Article IWV-3400.~~

BASES (continued)

SURVEILLANCE
REQUIREMENTS

SR 3.7.3.1

This SR ~~verifies that closure time ensures the actuation~~ of each MFIV is ~~≤ 9.6 seconds within the limit given in Reference 2~~ on an actual or simulated actuation signal. ~~The MFIV closure time is and is within that~~ assumed in the accident and containment analyses. ~~This SR also verifies the valve closure time is in accordance with the Inservice Testing Program.~~ This Surveillance SR is normally performed upon returning the unit to operation following a refueling outage. The MFIVs should not be full stroke tested at power.

The Frequency is in accordance with the Inservice Testing Program. The Frequency for valve closure time is based on the refueling cycle. Operating experience has shown that these components usually pass the SR when performed at the specified Frequency.

REFERENCES

1. UFSAR, Section 10.4.7.
2. UFSAR, Section 5.1.5.