

Technical Specification 5.5.14



Palo Verde Nuclear
Generating Station

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102-06414-TNW/CJS
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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
Technical Specification (TS) Bases Revision 55 and
Technical Requirements Manual (TRM) Revision 55**

Pursuant to PVNGS TS 5.5.14, "Technical Specifications Bases Control Program," Arizona Public Service Company (APS) is submitting TS Bases Revision 55. In addition, APS is submitting TRM Revision 55. The document revisions were implemented on September 1, 2011. Electronic files of the revised TS Bases and TRM are provided as Enclosure 1. The summary of changes for each document is provided in Enclosure 2.

No commitments are being made to the NRC by this letter. Should you need further information regarding this submittal, please contact Russell A. Stroud, Licensing Section Leader, at (623) 393-5111.

Sincerely,

TNW/RAS/CJS/gat

- Enclosure 1: Optical Storage Media (OSM) Electronic Files of PVNGS TS Bases Revision 55 and TRM Revision 55
- Enclosure 2: PVNGS Technical Specification Bases Revision 55 and TRM Revision 55 Summary of Changes

- cc: E. E. Collins Jr. NRC Region IV Regional Administrator (enclosures)
- L. K. Gibson NRC NRR Project Manager for PVNGS (enclosures)
- J. R. Hall NRC NRR Senior Project Manager (enclosures)
- M. A. Brown NRC Senior Resident Inspector for PVNGS (w/o enclosures)

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ENCLOSURE 2

PVNGS

Technical Specification Bases Revision 55

and

TRM Revision 55

Summary of Changes

Summary of Changes for Technical Specifications Bases Revision 55 and TRM Revision 55

Technical Specification Bases Revision 55 incorporates LDCRs 08-B015, 11-B006, 11-B007, 11-B008, 11-B009 and 11-B011.

- LDCR 08-B015 updates the references for the *Low Temperature Over Pressure Protection (LTOP)* TS Bases 3.4.13. This update reflects the replacement of the steam generators for all 3 Units and is consistent with the current design basis.
- LDCR 11-B006 clarifies TS Bases 3.7.6, *Condensate Storage Tank (CST)*, Actions A.1 and A.2 description to indicate that the Reactor Makeup Water Tank (RMWT), when used as an alternate source of water with the CST, need only contain enough water to supplement any reduced inventory in the CST. The combined inventories of the RMWT and CST may be credited to mitigate an event during the period of CST inoperability.
- LDCR 11-B007 clarifies TS Bases 3.4.12, *Pressurizer Vents*, Surveillance Requirement (SR) 3.4.12.1 with regard to post-maintenance testing of individual valves in the pressurizer vent paths. The change clarifies that in any Mode, partial surveillance tests can be performed for post-maintenance testing under site procedural controls that ensure the valve being tested is isolated from Reactor Coolant System (RCS) pressure. This change is consistent with approved LDCR 11-R002 for related TRM Section T3.4, *Reactor Coolant System*, TSR 3.4.104.2.
- LDCR 11-B008 corrects editorial and typographical errors in TS Bases Sections 3.3.12 and 3.8.1. Specifically, the word 'Channel' is corrected on page B 3.3.12-5, second paragraph, and TS Bases page 3.8.1-43, first paragraph, Reference 12 is corrected to Reference 11.
- LDCR 11-B009 provides greater clarity as to what actions are required to place the control room essential ventilation systems in the correct mode of operation to comply with TS Required Actions, and clarifies the appropriate reasons for the specifications being applicable.

Specifically, the change deletes reference to a Waste Gas Tank rupture event in TS Bases Sections 3.3.9, *Control Room Essential Filtration Actuation Signal (CREFAS)* and 3.7.11, *Control Room Essential Filtration System (CREFS)*, *Applicability*. Credit for CREFAS or CREFS for a Waste Gas Decay Tank rupture event was removed from the UFSAR by LDCR 98-F064. Both specifications remain applicable for Modes 5 or 6, as fuel handling accidents are of interest in these lower Modes.

In addition, LDCR 11-B009 adds to TS Bases Sections 3.3.9, 3.7.11 and 3.7.12, *Control Room Emergency Air Temperature Control System (CREATCS)*, *Actions*, clarifying text as to what actions are required to place the control room essential ventilation systems in the correct mode of operation to comply with various TS Required Actions. Specifically, CREFS needs to be in the essential filtration mode and the support systems for CREATCS need to be placed in operation to support its temperature control function.

Summary of Changes for Technical Specifications Bases Revision 55 and TRM Revision 55

- LDCR 11-B011 reflects the Refueling Water Tank level setpoints, approved in License Amendment 182, have been implemented in all three PVNGS Units. The Pre-RWT Setpoint data in TS Bases Section 3.5.5 is no longer required. This change is an administrative change to reflect the current plant configuration.

Technical Requirements Manual (TRM) Revision 55 incorporates LDCR 11-R002.

- LDCR 11-R002 clarifies TRM Section T3.4, *Reactor Coolant System*, TSR 3.4.104.2 with regard to post-maintenance testing of individual valves in the pressurizer vent paths. The change clarifies that in any Mode, partial surveillance tests can be performed for post-maintenance testing under site procedural controls that ensure the valve being tested is isolated from Reactor Coolant System (RCS) pressure. This change is consistent with approved LDCR 11-B007 for related TS Bases 3.4.12, *Pressurizer Vents*, Surveillance Requirement (SR) 3.4.12.1.