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AUTH.NAME AUTHOR AFFILIATION
VAN BRUNT,E.E. Arizona Public Service Co.
RECIP.NAME RECIPIENT AFFILIATION
KNIGHTON,G.W. Licensing Branch 3

SUBJECT: Application for amend to License NPF-41,requesting Tech Spec one-time exception to allow for performance of startup natural circulation test program,Fee paid.

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Director of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

July 5, 1985
ANPP-32969-EEVB/BJA

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Docket No. STN 50-528, License No. NPF-41
Subject: Special Test Exception for Natural Circulation Cooldown Testing
File: 85-056-026; G.1.01.10

References: (1) Letter from E. E. Van Brunt, Jr., ANPP, to G. W. Knighton, NRC, dated January 31, 1985 (ANPP-31829). Subject: Natural Circulation Cooldown Testing.
(2) NUREG-0857, Supplement No. 8, "Safety Evaluation Report related to the Operation of Palo Verde Nuclear Generating Station, Units 1, 2, and 3," dated May, 1985.

Dear Mr. Knighton:

Submitted herewith is a request for a Technical Specification one-time exception to allow for the performance of the Startup Natural Circulation Test Program at PVNGS Unit 1. The Natural Circulation Test Program consists of a Loss of Offsite Power Test at 50% power and a Natural Circulation Cooldown Test at 80% power. Enclosed within this request package are the following:

a. Description of proposed change.
b. Marked-up Technical Specification change page.
c. Justification for the proposed amendment request.
d. Significant hazards consideration determination.
e. Proposed compensatory measures.

In accordance with the requirements of 10CFR 170.12(c), the license amendment application fee of $150.00 is also enclosed.

If you have any questions on this matter, please contact Mr. W. F. Quinn of my staff.

Very truly yours,

EE Van Brunt/BJA

E. E. Van Brunt, Jr.
Executive Vice President
Project Director

EEVB/BJA/slh
Attachments

cc: E. A. Licitra (all w/a)
R. P. Zimmerman
A. C. Gehr
C. F. Tedford

A001
1/1
w/check
$150.00

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Donald B. Karner, represent that I am Assistant Vice President, Nuclear Production of Arizona Nuclear Power Project, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority to do so, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true.

Donald B. Karner

Sworn to before me this 5 day of July, 1985.

Nora E. Meador
Notary Public

My Commission Expires:

My Commission Expires April 6, 1987

Attachment

Description of Proposed Change:

During the performance of the Startup Natural Circulation tests, the reactor coolant pumps must be de-energized for a period of time which is longer than the one hour allowed by the Limiting Condition for Operation of Technical Specifications 3.4.1.2 and 3.4.1.3. Additionally, the Atmospheric Dump Valves (ADV's) will be powered from their backup power sources during the testing in order to demonstrate compliance with BTP RSB 5-1. The surveillance requirements of Technical Specification 3.7.1.6 for the nitrogen accumulator tank pressure cannot be met during the performance of the tests. A Special Test Exception is requested for the performance of the Natural Circulation Test program. The Special Test Exception would suspend the requirements of Technical Specifications 3.4.1.2, 3.4.1.3., and 3.7.1.6 during the performance of the startup Natural Circulation Tests. Please refer to the attached new Technical Specification.

Justification for the Proposed Amendment Request

The Technical Specfication exemptions are requested for the performance of the Loss of Offsite Power test at 50% power and the Natural Circulation Cooldown test at 80% power. The Loss of Offsite Power test is expected to take approximately 6 hours to perform (if boron mixing demonstration is performed during this test). The duration of the Natural Circulation Cooldown test is anticipated to be approximately 24 hours. These two approximations are estimated time durations for which the reactor coolant pumps will be de-energized during the testing. The requested exemption to allow for the de-energization of the reactor coolant pumps during the testing will not increase the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR for the following reasons:

1) Operations involving a reduction in reactor coolant system boron concentration will be suspended during the testing.

2) Core outlet temperature will be maintained at least 10 F below saturation temperature during the testing.

3) Necessary safety related equipment will be available for use during the testing.

4) The reactor coolant pumps will be available per applicable restart procedures during the testing to return the reactor coolant system to a forced circulation condition.

5) The reactor will be shutdown in Modes 3 or 4 during the testing.

6) Similar exemptions have been granted to San Onofre, Diablo Canyon, and Waterford 3 for the purpose of performing natural circulation cooldown testing.

The atmospheric dump valves (ADVs) are used during the performance of these tests to remove decay heat from the reactor. The ADVs will be powered from their backup power source during the tests in order to demonstrate an adequate safety-grade backup power supply in accordance with the requirements of BTP RSB 5-1. Therefore, surveillance requirement 4.7.1.6 (a) can not be satisfied when the ADVs are being used for decay heat removal and are being powered from their backup power source. An exemption is requested from the requirements of Technical Specification 3.7.1.6 to avoid entering into the action statement during these tests. Operation of the plant with this Technical Specification exemption will not result in a condition that has not been previously analyzed since Technical Specification 3.7.1.6 allows for ADVs to be inoperable for up to 72 hours.

Significant Hazards Consideration Determination:

The proposed amendment request does involve a Significant Hazards Consideration however,

(A) Operation of PVNGS Unit 1 in accordance with this change would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety; and

(B) The proposed change matches the example cited in 48FR 14864; i.e., the proposed change involves a significant relaxation of the bases for limiting safety system settings or limiting conditions for operation.

However, this proposed change is accompanied by compensatory conditions that will maintain a commensurate level of safety. Please refer to the Section of this Attachment entitled "Justification for the Proposed Amendment Request" for a description of the compensatory conditions.

Proposed Compensatory Measures

The proposed compensatory measures are contained in the section entitled "Justification for the Proposed Amendment Request" of this Attachment.