ADMINISTRATIVE CONTROLS

TECH SPEC #	TABLE #	ACTION #	REQUIRED CHANGE	REASON
I. 3.3.3.1	3.3-6	27.(1)	Delete Section 1 and change sections 2 and 3 to 1 and 2 respectively.	Pre-planned Alternates to these monitors are found in EPIP's and are implemented at all times.
II. 3.3.3.1	3.3-6 p3-39	28(1)	Delete Section 1 and change section 2 to follow the phrase "within 7 days".	Current Regulatory guidance does not require a backup system for a manual PASS.
	p3-38	———	Instrument 3-Delete ### in its entirety	Any definition requirements not contained in Tech Specs can be found in the Station Manual.
III. 3.3.3.9	3.3-13	37(a)	Delete "a." change to: a. Place movable air monitors in line. b. Take grab samples at least once per 12 hours	Regardless of the deletion of PASP, this should be changed as stated since existing "a" is not an appropriate alternative to "b".
IV. 3.3.3.9	3.3-13	42(a)	Delete "a" change "b" statement to follow the word "or".	PASP will be implemented by Station Manual Procedures.
V. 6.5.3.5	———	———	Delete item "1". from audit list.	If PASP is not a program it need not be audited by NSG.
VI. 6.8.1	———	———	Delete item "k" from list. Redesignate remaining listings to follow in order beginning with k.	If PASP is not a Tech Spec Program its implementation should not be required by Tech Specs.
VII. 6.16	———	———	Delete in its entirety.	Deletion requested per this submittal.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.1.2.2

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety; and

(B) The proposed amendment is a purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.

Surveillance requirements should renumbered to maintain standard numbering sequence.

FLOW PATHS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.2 At least two of the following three boron injection flow paths shall be OPERABLE:

a. A gravity feed flow path from either the refueling water tank or the spent fuel pool through CH-536 (RWT Gravity Feed Isolation Valve) and a charging pump to the Reactor Coolant System,

b. A gravity feed flow path from the refueling water tank through CH-327 (RWT Gravity Feed/Safety Injection System Isolation Valve) and a charging pump to the Reactor Coolant System,

c. A flow path from either the refueling water tank or the spent fuel pool through CH-164 (Boric Acid Filter Bypass Valve), utilizing gravity feed and a charging pump to the Reactor Coolant System.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With only one of the above required boron injection flow paths to the Reactor Coolant System OPERABLE, restore at least two boron injection flow paths to the Reactor Coolant System to OPERABLE status within 72 hours or be in at least HOT STANDBY and borated to a SHUTDOWN MARGIN equivalent to at least 6% delta k/k at 210°F within the next 6 hours; restore at least two flow paths to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.2. At least two of the above required flow paths shall be demonstrated OPERABLE:

a. At least once per 31 days by verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.

b. At least once per 18 months when the Reactor Coolant System is at normal operating pressure by verifying that the flow path required by Specification 3.1.2.2 delivers at least 26 gpm for 1 charging pump and 68 gpm for two charging pumps to the Reactor Coolant System.

4.1.2.2.2

~~4.1.2.3~~ The provisions of Specification 4.0.4 are not applicable for entry into Mode 3 or Mode 4 to perform the surveillance testing of Specification 4.1.2.2.b provided the testing is performed within 24 hours after achieving normal operating pressure in the reactor coolant system.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.2.2 Table 3.3.-3

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a purely administrative change to technical specifications.

The last sentence discusses returning one channel to operable status which places the status in a one less than total channels condition. This is the subject of action 13.

TABLE 3.3-3 (Continued)

ACTION STATEMENTS (Continued)

ACTION 14 - With the number of channels OPERABLE one less than the Minimum Channels OPERABLE, STARTUP and/or POWER OPERATION may continue provided the following conditions are satisfied:

a. Verify that one of the inoperable channels has been bypassed and place the other inoperable channel in the tripped condition within 1 hour.

b. All functional units affected by the bypassed/tripped channel shall also be placed in the bypassed/tripped condition as listed below:

Process Measurement Circuit	Functional Unit Bypassed/Tripped
1. Steam Generator Pressure - Low	Steam Generator Pressure - Low Steam Generator Level 1 - Low (ESF) Steam Generator Level 2 - Low (ESF)
2. Steam Generator Level - Low (Wide Range)	Steam Generator Level - Low (RPS) Steam Generator Level 1 - Low (ESF) Steam Generator Level 2 - Low (ESF)

STARTUP and/or POWER OPERATION may continue until the performance of the next required CHANNEL FUNCTIONAL TEST. Subsequent STARTUP and/or POWER OPERATION may continue if one channel is restored to OPERABLE status and the provisions of ACTION ~~14~~ 13 are satisfied.

ACTION 15 - With the number of OPERABLE channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.

ACTION 16 - With the number of OPERABLE channels one less than the Total Number of Channels, be in at least HOT STANDBY within 6 hours and in at least HOT SHUTDOWN within the following 6 hours; however, one channel may be bypassed for up to 1 hour for surveillance testing provided the other channel is OPERABLE.

ACTION 17 - With the number of OPERABLE channels one less than the Minimum Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

ACTION 18 - With the number of OPERABLE channels one less than the Minimum Number of Channels, operation may continue for up to 6 hours. After 6 hours operation may continue provided at least 1 train of essential filtration is in operation, otherwise, be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.3.1 Table 4.3.-1

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a purely administrative change to technical specifications.

Since specification 2.2.2 does not exist in these technical specifications, the reference to specification 2.2.2 in table notation (9) should be deleted.

TABLE 4.3-1 (Continued)

TABLE NOTATIONS

* - With reactor trip breakers in the closed position and the CEA drive system capable of CEA withdrawal, and fuel in the reactor vessel.

(1) - Each STARTUP or when required with the reactor trip breakers closed and the CEA drive system capable of rod withdrawal, if not performed in the previous 7 days.

(2) - Heat balance only (CHANNEL FUNCTIONAL TEST not included), above 15% of RATED THERMAL POWER; adjust the linear power level, the CPC delta T power and CPC nuclear power signals to agree with the calorimetric calculation if absolute difference is greater than 2%. During PHYSICS TESTS, these daily calibrations may be suspended provided these calibrations are performed upon reaching each major test power plateau and prior to proceeding to the next major test power plateau.

(3) - Above 15% of RATED THERMAL POWER, verify that the linear power sub-channel gains of the excore detectors are consistent with the values used to establish the shape annealing matrix elements in the Core Protection Calculators.

(4) - Neutron detectors may be excluded from CHANNEL CALIBRATION.

(5) - After each fuel loading and prior to exceeding 70% of RATED THERMAL POWER, the incore detectors shall be used to determine the shape annealing matrix elements and the Core Protection Calculators shall use these elements.

(6) - This CHANNEL FUNCTIONAL TEST shall include the injection of simulated process signals into the channel as close to the sensors as practicable to verify OPERABILITY including alarm and/or trip functions.

(7) - Above 70% of RATED THERMAL POWER, verify that the total steady-state RCS flow rate as indicated by each CPC is less than or equal to the actual RCS total flow rate determined by either using the reactor coolant pump differential pressure instrumentation or by calorimetric calculations and if necessary, adjust the CPC addressable constant flow coefficients such that each CPC indicated flow is less than or equal to the actual flow rate. The flow measurement uncertainty may be included in the BERR1 term in the CPC and is equal to or greater than 4%.

(8) - Above 70% of RATED THERMAL POWER, verify that the total steady-state RCS flow rate as indicated by each CPC is less than or equal to the actual RCS total flow rate determined by either using the reactor coolant pump differentral pressure instrumentation and the ultrasonic flow meter adjusted pump curves or calorimetric calculations.

(9) - The monthly CHANNEL FUNCTIONAL TEST shall include verification that the correct (current) values of addressable constants are installed in each OPERABLE CPC. ~~per Specification 2.2.2. e~~

(10) - At least once per 18 months and following maintenance or adjustment of the reactor trip breakers, the CHANNEL FUNCTIONAL TEST shall include independent verification of the undervoltage and shunt trips.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.3.2 Table 4.3-2

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a purely administrative change to technical specifications.

Table 4.3-2 must be changed to be consistent with table 3.3-3. The Unit 2 Tech. Specs. used Unit 1 Tech. Specs. as a model, and they will be changed by separate request.

The change as proposed by this letter agree with the Standard Technical Specifications.

TABLE 4.3-2

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

ESFA SYSTEM FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
I. SAFETY INJECTION (SIAS)				
A. Sensor/Trip Units				
1. Containment Pressure - High	S	R	M	1, 2, 3, 4
2. Pressurizer Pressure - Low	S	R	M	1, 2, 3, 4
B. ESFA System Logic				
1. Matrix Logic	NA	NA	M	1, 2, 3, 4
2. Initiation Logic	NA	NA	M	1, 2, 3, 4
3. Manual SIAS	NA	NA	M	1, 2, 3, 4
C. Automatic Actuation Logic	NA	NA	M(1) (2) (3)	1, 2, 3, 4
II. CONTAINMENT ISOLATION (CIAS)				
A. Sensor/Trip Units				
1. Containment Pressure - High	S	R	M	1, 2, 3
2. Pressurizer Pressure - Low	S	R	M	1, 2, 3
B. ESFA System Logic				
1. Matrix Logic	NA	NA	M	1, 2, 3, 4
2. Initiation Logic	NA	NA	M	1, 2, 3, 4
3. Manual CIAS	NA	NA	M	1, 2, 3, 4
4. Manual SIAS	NA	NA	M	1, 2, 3, 4

TABLE 4.3-2 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

ESFA SYSTEM FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
II. CONTAINMENT ISOLATION (Continued)				
C. Automatic Actuation Logic	NA	NA	M(1) (2) (3)	1, 2, 3, 4
III. CONTAINMENT SPRAY (CSAS)				
A. Sensor/Trip Units				
1. Containment Pressure -- High - High	S	R	M	1, 2, 3
B. ESFA System Logic				
1. Matrix Logic	NA	NA	M	1, 2, 3, (4)e
2. Initiation Logic	NA	NA	M	1, 2, 3, 4
3. Manual CSAS	NA	NA	M	1, 2, 3, 4
C. Automatic Actuation Logic	NA	NA	M(1) (2) (3)	1, 2, 3, 4

CONTROLLED BY USER

TABLE 4.3-2 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

ESI	SYSTEM FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
V.	RECIRCULATION (RAS)				
	A. Sensor/Trip Units				
	Refueling Water Storage Tank - Low	S	R	M	1, 2, 3
	B. ESFA System Logic				
	1. Matrix Logic	NA	NA	M	1, 2, 3, (4)e
	2. Initiation Logic	NA	NA	M	1, 2, 3, 4
	3. Manual RAS	NA	NA	M	1, 2, 3, 4
	C. Automatic Acutation Logic	NA	NA	M(1) (2) (3)	1, 2, 3, 4
VI.	AUXILIARY FEEDWATER (SG-1)(AFAS-1)				
	A. Sensor/Trip Units				
	1. Steam Generator #1 Level - Low	S	R	M	1, 2, 3
	2. Steam Generator Δ Pressure SG2 > SG1	S	R	M	1, 2, 3

TABLE 4.3-2 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

ESF	SYSTEM FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
VI.	AUXILIARY FEEDWATER (SG-1)(AFAS-1) (Continued)				
	B. ESFA System Logic				
	1. Matrix Logic	NA	NA	M	1, 2, 3, (4)e
	2. Initiation Logic	NA	NA	M	1, 2, 3, 4
	3. Manual AFAS	NA	NA	M	1, 2, 3, 4
	C. Automatic Actuation Logic	NA	NA	M(1) (2) (3)	1, 2, 3, 4
VII.	AUXILIARY FEEDWATER (SG-2)(AFAS-2)				
	A. Sensor/Trip Units				
	1. Steam Generator #2 Level - Low	S	R	M	1, 2, 3
	2. Steam Generator Δ Pressure SG1 > SG2	S	R	M	1, 2, 3
	B. ESFA System Logic				
	1. Matrix Logic	NA	NA	M	1, 2, 3, (4)e
	2. Initiation Logic	NA	NA	M	1, 2, 3, 4
	3. Manual AFAS	NA	NA	M	1, 2, 3, 4
	C. Automatic Actuation Logic	NA	NA	M(1) (2) (3)	1, 2, 3, 4
VIII.	LOSS OF POWER (LOV)				
	A. 4.16 kV Emergency Bus Under-voltage (Loss of Voltage)	S	R	R	1, 2, 3, (4)e
	B. 4.16 kV Emergency Bus Under-voltage (Degraded Voltage)	S	R	R	1, 2, 3, (4)e

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.3.3 Table 3.3-6

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a purely administrative change to technical specifications.

This change requires a manual action which is the same as the automatic action which would occur.

TABLE 3.3-6 (Continued)

ACTION STATEMENTS

ACTION 22 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, perform area surveys of the monitored area with portable monitoring instrumentation at least once per 24 hours.

ACTION 23 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.4.5.1.

ACTION 24 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.9.12 or operate the fuel building essential ventilation system while handling irradiated fuel.

ACTION 25 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.9.9.

ACTION 26 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, within 1 hour initiate and maintain operation of the control room emergency ventilation system in the ~~recirculation~~ ESSENTIAL FILTRATION mode of operation.

ACTION 27 - With the number of OPERABLE Channels less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable channel(s) to OPERABLE status within 72 hours, or:

1. For area monitors RU-139 A and B, RU-140 A and B, RU-148 and RU-149, initiate a preplanned alternate program to monitor the appropriate parameters.

2. For process monitors, place moveable air monitor in-line.

3. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.

ACTION 28 - With the number of OPERABLE Channels one less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable channel(s) to OPERABLE status within 7 days, or:

1. Initiate the Preplanned Alternate Sampling Program of Specification 6.16 to monitor the appropriate parameter(s).

2. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event outlining the action(s) taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.3.3.1 Action 27

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a purely administrative change to technical specification.

The Pre-Planned Alternate Sampling Program is not required by the Standard Tech. Spec. Review Plan. The design of our high range monitors is consistent with regulatory guidance, therefore, no special Tech. Spec. considerations are necessary.

Deletion of the Pre-Planned Alternate Sampling Program from Technical Specifications

The need to maintain the Pre-Planned Alternate Sampling Program (PASP) as a Technical Specification Program is unnecessary. The PASP has no precedented counterpart in the Standard Technical Specifications. Notification of deficiencies in the Operability status of High Range and Accident Analysis monitors and system may be achieved by the existing system of Special Report submittals. Enforcement action may be initiated based on the submittals should efforts of the facility staff to correct these situations be found to be repeatedly inadequate.

The existing Pre-Planned Alternate Sampling Program and other pre-planned contingencies should be maintained by the facility outside the scope of Technical Specification requirements.

Regardless of the deletion of PASP as a Technical Specification Program, items I and III on the following table are requested to be deleted for the reasons listed.

In addition, current regulatory guidance does not require a backup system for the Post Accident Sampling System.

TECH SPEC #	TABLE #	ACTION #	REQUIRED CHANGE	REASON
I. 3.3.3.1	3.3-6	27.(1)	Delete Section 1 and change sections 2 and 3 to 1 and 2 respectively.	Pre-planned Alternates to these monitors are found in EPIP's and are implemented at all times.
II. 3.3.3.1	3.3-6 p3-39	28(1)	Delete Section 1 and change section 2 to follow the phrase "within 7 days".	Current Regulatory guidance does not require a backup system for a manual PASS.
	p3-38	———	Instrument 3-Delete ### in its entirety	Any definition requirements not contained in Tech Specs can be found in the Station Manual.
III. 3.3.3.9	3.3-13	37(a)	Delete "a." change to: a. Place movable air monitors in line. b. Take grab samples at least once per 12 hours	Regardless of the deletion of PASP, this should be changed as stated since existing "a" is not an appropriate alternative to "b".
IV. 3.3.3.9	3.3-13	42(a)	Delete "a" change "b" statement to follow the word "or".	PASP will be implemented by Station Manual Procedures.
V. 6.5.3.5	———	———	Delete item "1". from audit list.	If PASP is not a program it need not be audited by NSG.
VI. 6.8.1	———	———	Delete item "k" from list. Redesignate remaining listings to follow in order beginning with k.	If PASP is not a Tech Spec Program its implementation should not be required by Tech Specs.
VII. 6.16	———	———	Delete in its entirety.	Deletion requested per this submittal.

TABLE 3.3-6 (Continued)

ACTION STATEMENTS

ACTION 22 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, perform area surveys of the monitored area with portable monitoring instrumentation at least once per 24 hours.

ACTION 23 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.4.5.1.

ACTION 24 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.9.12 or operate the fuel building essential ventilation system while handling irradiated fuel.

ACTION 25 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.9.9.

ACTION 26 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, within 1 hour initiate and maintain operation of the control room emergency ventilation system in the recirculation mode of operation.

ACTION 27 - With the number of OPERABLE Channels less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable channel(s) to OPERABLE status within 72 hours, or:

1. For area monitors RU-139 A and B, RU-140 A and B, RU-148 and RU-149, initiate a preplanned alternate program to monitor the appropriate parameters.

1. 2. For process monitors, place moveable air monitor in-line.

2. 3. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.

ACTION 28 - With the number of OPERABLE Channels one less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable channel(s) to OPERABLE status within 7 days, or:

1. Initiate the Preplanned Alternate Sampling Program of Specification 6.16 to monitor the appropriate parameter(s).

2. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event outlining the action(s) taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.3.3.1 Action 28

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a purely administrative change to technical specification.

The Pre-Planned Alternate Sampling Program is not required by the Standard Tech. Spec. Review Plan. The design of our high range monitors is consistent with regulatory guidance, therefore, no special Tech. Spec. considerations are necessary.

Deletion of the Pre-Planned Alternate Sampling Program from Technical Specifications

The need to maintain the Pre-Planned Alternate Sampling Program (PASP) as a Technical Specification Program is unnecessary. The PASP has no precedented counterpart in the Standard Technical Specifications. Notification of deficiencies in the Operability status of High Range and Accident Analysis monitors and system may be achieved by the existing system of Special Report submittals. Enforcement action may be initiated based on the submittals should efforts of the facility staff to correct these situations be found to be repeatedly inadequate.

The existing Pre-Planned Alternate Sampling Program and other pre-planned contingencies should be maintained by the facility outside the scope of Technical Specification requirements.

Regardless of the deletion of PASP as a Technical Specification Program, items I and III on the following table are requested to be deleted for the reasons listed.

In addition, current regulatory guidance does not require a backup system for the Post Accident Sampling System.

TECH SPEC #	TABLE #	ACTION #	REQUIRED CHANGE	REASON
I. 3.3.3.1	3.3-6	27.(1)	Delete Section 1 and change sections 2 and 3 to 1 and 2 respectively.	Pre-planned Alternates to these monitors are found in EPIP's and are implemented at all times.
II. 3.3.3.1	3.3-6 p3-39 p3-38	28(1) ———	Delete Section 1 and change section 2 to follow the phrase "within 7 days". Instrument 3-Delete ### in its entirety	Current Regulatory guidance does not require a backup system for a manual PASS. Any definition requirements not contained in Tech Specs can be found in the Station Manual.
III. 3.3.3.9	3.3-13	37(a)	Delete "a." change to: a. Place movable air monitors in line. b. Take grab samples at least once per 12 hours	Regardless of the deletion of PASP, this should be changed as stated since existing "a" is not an appropriate alternative to "b".
IV. 3.3.3.9	3.3-13	42(a)	Delete "a" change "b" statement to follow the word "or".	PASP will be implemented by Station Manual Procedures.
V. 6.5.3.5	———	———	Delete item "1". from audit list.	If PASP is not a program it need not be audited by NSG.
VI. 6.8.1	———	———	Delete item "k" from list. Redesignate remaining listings to follow in order beginning with k.	If PASP is not a Tech Spec Program its implementation should not be required by Tech Specs.
VII. 6.16	———	———	Delete in its entirety.	Deletion requested per this submittal.

TABLE 3.3-6 (Continued)

ACTION STATEMENTS

ACTION 22 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, perform area surveys of the monitored area with portable monitoring instrumentation at least once per 24 hours.

ACTION 23 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.4.5.1.

ACTION 24 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.9.12 or operate the fuel building essential ventilation system while handling irradiated fuel.

ACTION 25 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.9.9.

ACTION 26 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, within 1 hour initiate and maintain operation of the control room emergency ventilation system in the recirculation mode of operation.

ACTION 27 - With the number of OPERABLE Channels less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable channel(s) to OPERABLE status within 72 hours, or:

1. For area monitors RU-139 A and B, RU-140 A and B, RU-148 and RU-149, initiate a preplanned alternate program to monitor the appropriate parameters.

2. For process monitors, place moveable air monitor in-line.

3. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.

ACTION 28 - With the number of OPERABLE Channels one less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable channel(s) to OPERABLE status within 7 days, or:

1. Initiate the Preplanned Alternate Sampling Program of Specification 6.16 to monitor the appropriate parameter(s).

2. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event outlining the action(s) taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.3.3.1 Action 37

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety; and

(B) The proposed amendment is a purely administrative change to technical specification.

The Pre-Planned Alternate Sampling Program is not required by the Standard Tech. Spec. Review Plan. The design of our high range monitors is consistent with regulatory guidance, therefore, no special Tech. Spec. considerations are necessary.

Deletion of the Pre-Planned Alternate Sampling Program from Technical Specifications

The need to maintain the Pre-Planned Alternate Sampling Program (PASP) as a Technical Specification Program is unnecessary. The PASP has no precedented counterpart in the Standard Technical Specifications. Notification of deficiencies in the Operability status of High Range and Accident Analysis monitors and systems may be achieved by the existing system of Special Report submittals. Enforcement action may be initiated based on the submittals should efforts of the facility staff to correct these situations be found to be repeatedly inadequate.

The existing Pre-Planned Alternate Sampling Program and other pre-planned contingencies should be maintained by the facility outside the scope of Technical Specification requirements.

Regardless of the deletion of PASP as a Technical Specification Program, items I and III on the following table are requested to be deleted for the reasons listed.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.3.3.1 Action 37

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety; and

(B) The proposed amendment is a purely administrative change to technical specification.

The Pre-Planned Alternate Sampling Program is not required by the Standard Tech. Spec. Review Plan. The design of our high range monitors is consistent with regulatory guidance, therefore, no special Tech. Spec. considerations are necessary.

TECH SPEC #	TABLE #	ACTION #	REQUIRED CHANGE	REASON
I. 3.3.3.1	3.3-6	27.(1)	Delete Section 1 and change sections 2 and 3 to 1 and 2 respectively.	Pre-planned Alternates to these monitors are found in EPIP's and are implemented at all times.
II. 3.3.3.1	3.3-6 p3-39	28(1)	Delete Section 1 and change section 2 to follow the phrase "within 7 days".	Current Regulatory guidance does not require a backup system for a manual PASS.
	p3-38	———	Instrument 3-Delete ### in its entirety	Any definition requirements not contained in Tech Specs can be found in the Station Manual.
III. 3.3.3.9	3.3-13	37(a)	Delete "a." change to: a. Place movable air monitors in line. b. Take grab samples at least once per 12 hours	Regardless of the deletion of PASP, this should be changed as stated since existing "a" is not an appropriate alternative to "b".
IV. 3.3.3.9	3.3-13	42(a)	Delete "a" change "b" statement to follow the word "or".	PASP will be implemented by Station Manual Procedures.
V. 6.5.3.5	———	———	Delete item "1". from audit list.	If PASP is not a program it need not be audited by NSG.
VI. 6.8.1	———	———	Delete item "k" from list. Redesignate remaining listings to follow in order beginning with k.	If PASP is not a Tech Spec Program its implementation should not be required by Tech Specs.
VII. 6.16	———	———	Delete in its entirety.	Deletion requested per this submittal.

TABLE 3.3-13 (Continued)

TABLE NOTATION

* At all times.
** During GASEOUS RADWASTE SYSTEM operation.
\# During waste gas release.
In MODES 1, 2, 3, and 4 or when irradiated fuel is in the fuel storage pool.

ACTION 35 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, the contents of the tank(s) may be released to the environment provided that prior to initiating the release:

a. At least two independent samples of the tank's contents are analyzed, and

b. At least two technically qualified members of the facility staff independently verify the release rate calculations and discharge valve lineup;

Otherwise, suspend release of radioactive effluents via this pathway.

ACTION 36 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours.

ACTION 37 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided the actions of (a) or (b) are performed:

a. Initiate the Preplanned Alternate Sampling Program of Specification 6.16 to monitor the appropriate parameter(s).

b. Place moveable air monitors in-line or take grab samples at least once per 12 hours.

ACTION 38 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, immediately suspend PURGING of radioactive effluents via this pathway.

ACTION 39 - With the number of channnels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, operation of the GASEOUS RADWASTE SYSTEM may continue provided grab samples are taken and analyzed daily. With both channels inoperable operation may continue provided grab samples are taken and analyzed (1) every 4 hours during degassing operations, and (2) daily during other operations.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.3.3.1 Action 42

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a purely administrative change to technical specification.

The Pre-Planned Alternate Sampling Program is not required by the Standard Tech. Spec. Review Plan. The design of our high range monitors is consistent with regulatory guidance, therefore, no special Tech. Spec. considerations are necessary.

Deletion of the Pre-Planned Alternate Sampling Program from Technical Specifications

The need to maintain the Pre-Planned Alternate Sampling Program (PASP) as a Technical Specification Program is unnecessary. The PASP has no precedented counterpart in the Standard Technical Specifications. Notification of deficiencies in the Operability status of High Range and Accident Analysis monitors and systems may be achieved by the existing system of Special Report submittals. Enforcement action may be initiated based on the submittals should efforts of the facility staff to correct these situations be found to be repeatedly inadequate.

The existing Pre-Planned Alternate Sampling Program and other pre-planned contingencies should be maintained by the facility outside the scope of Technical Specification requirements.

Regardless of the deletion of PASP as a Technical Specification Program, items I and III on the following table are requested to be deleted for the reasons listed.

In addition, the Pre-Planned Alternate Sampling Program will be implemented by Station Manual procedures.

TECH SPEC #	TABLE #	ACTION #	REQUIRED CHANGE	REASON
I. 3.3.3.1	3.3-6	27.(1)	Delete Section 1 and change sections 2 and 3 to 1 and 2 respectively.	Pre-planned Alternates to these monitors are found in EPIP's and are implemented at all times.
II. 3.3.3.1	3.3-6 p3-39	28(1)	Delete Section 1 and change section 2 to follow the phrase "within 7 days".	Current Regulatory guidance does not require a backup system for a manual PASS.
	p3-38	———	Instrument 3-Delete ### in its entirety	Any definition requirements not contained in Tech Specs can be found in the Station Manual.
III. 3.3.3.9	3.3-13	37(a)	Delete "a." change to: a. Place movable air monitors in line. b. Take grab samples at least once per 12 hours	Regardless of the deletion of PASP, this should be changed as stated since existing "a" is not an appropriate alternative to "b".
IV. 3.3.3.9	3.3-13	42(a)	Delete "a" change "b" statement to follow the word "or".	PASP will be implemented by Station Manual Procedures.
V. 6.5.3.5	———	———	Delete item "1". from audit list.	If PASP is not a program it need not be audited by NSG.
VI. 6.8.1	———	———	Delete item "k" from list. Redesignate remaining listings to follow in order beginning with k.	If PASP is not a Tech Spec Program its implementation should not be required by Tech Specs.
VII. 6.16	———	———	Delete in its entirety.	Deletion requested per this submittal.

TABLE 3.3-13 (Continued)

TABLE NOTATION

ACTION 40 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via the effected pathway may continue provided samples are continuously collected with auxiliary sampling equipment as required in Table 4.11-2 within one hour after the channel has been declared inoperable.

ACTION 41 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirements, comply with the ACTION b of Specification 3.9.12 or operate the fuel building essential ventilation system while moving irradiated fuel.

ACTION 42 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement restore the channel to OPERABLE status within 72 hours or:

a. Initiate the Preplanned Alternate Sampling Program of Specification 6.16 to monitor the appropriate parameter(s) when it is needed.

b. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event outlining the action(s) taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.3.3.1 Table 3.3-6

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a purely administrative change to technical specification.

The Pre-Planned Alternate Sampling Program is not required by the Standard Technical Specification Review Plan. The design of our high range monitors is consistent with regulatory guidance, therefore, no special tech. spec. considerations are necessary.

Deletion of the Pre-Planned Alternate Sampling Program from Technical Specifications

The need to maintain the Pre-Planned Alternate Sampling Program (PASP) as a Technical Specification Program is unnecessary. The PASP has no precedented counterpart in the Standard Technical Specifications. Notification of deficiencies in the Operability status of High Range and Accident Analysis monitors and systems may be achieved by the existing system of Special Report submittals. Enforcement action may be initiated based on the submittals should efforts of the facility staff to correct these situations be found to be repeatedly inadequate.

The existing Pre-Planned Alternate Sampling Program and other pre-planned contingencies should be maintained by the facility outside the scope of Technical Specification requirements.

Regardless of the deletion of PASP as a Technical Specification Program, items I and III on the following table are requested to be deleted for the reasons listed.

Station Manual procedures will define the minimum channels required if not listed elsewhere in the Technical Specifications.

TECH SPEC #	TABLE #	ACTION #	REQUIRED CHANGE	REASON
I. 3.3.3.1	3.3-6	27.(1)	Delete Section 1 and change sections 2 and 3 to 1 and 2 respectively.	Pre-planned Alternates to these monitors are found in EPIP's and are implemented at all times.
II. 3.3.3.1	3.3-6 p3-39	28(1)	Delete Section 1 and change section 2 to follow the phrase "within 7 days".	Current Regulatory guidance does not require a backup system for a manual PASS.
	p3-38	———	Instrument 3-Delete ### in its entirety	Any definition requirements not contained in Tech Specs can be found in the Station Manual.
III. 3.3.3.9	3.3-13	37(a)	Delete "a." change to: a. Place movable air monitors in line. b. Take grab samples at least once per 12 hours	Regardless of the deletion of PASP, this should be changed as stated since existing "a" is not an appropriate alternative to "b".
IV. 3.3.3.9	3.3-13	42(a)	Delete "a" change "b" statement to follow the word "or".	PASP will be implemented by Station Manual Procedures.
V. 6.5.3.5	———	———	Delete item "1". from audit list.	If PASP is not a program it need not be audited by NSG.
VI. 6.8.1	———	———	Delete item "k" from list. Redesignate remaining listings to follow in order beginning with k.	If PASP is not a Tech Spec Program its implementation should not be required by Tech Specs.
VII. 6.16	———	———	Delete in its entirety.	Deletion requested per this submittal.

TABLE 3.3-6

RADIATION MONITORING INSTRUMENTATION

	INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ALARM/TRIP SETPOINT	MEASUREMENT RANGE	ACTION
1.	Area Monitors					
	A. Fuel Pool Area RU-31	1	**	≤15mR/hr	10^{-1} to 10^{4}mR/hr	22 & 24
	B. New Fuel Area RU-19	1	*	≤15mR/hr	10^{-1} to 10^{4}mR/hr	22
	C. Containment RU-148 & RU-149	2	1,2,3,4	≤10R/hr	1R/hr to 10^{7}R/hr	27
	D. Containment Power Access Purge Exhaust RU-37 & RU-38	1	#	≤2.5mR/hr	10^{-1} to 10^{-4}mR/hr	25
	E. Main Steam					
	1) RU-139 A&B	1	1,2,3,4	##	10^{-3} to 10^{4}R/hr	27
	2) RU-140 A&B	1	1,2,3,4	##	10^{-3} to 10^{4}R/hr	27
2.	Process Monitors					
	A. Containment Building Atmosphere RU-1	2	1,2,3,4			23 & 27
	1) Particulate			≤2.3×10^{-6}µCi/cc Cs-137	10^{-9} to 10^{-4}µCi/cc	
	2) Gaseous			≤6.6×10^{-2}µCi/cc Xe-133	10^{-6} to 10^{-1}µCi/cc	
	B. Noble Gas Monitors. Control Room Ventilation Intake RU-29 & RU-30	1	ALL MODES	≤2×10^{-5}µCi/cc	10^{-6} to 10^{-1}µCi/cc	26
3.	Post Accident Sampling System	1###	1,2,3	N.A.	N.A.	28

With fuel in the storage pool or building.
With irradiated fuel in the storage pool.
When purge is being used.
Three (3) times background in Rem/hour.
The Minimum Channels Operable will be defined in the Preplanned Alternate Sampling Program of Specification 6.16.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.3.3.5

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a purely administrative change to technical specifications.

This change corrects typos and makes corrections to equipment designators. This change will help to insure that surveillance procedures contain the correct information. This change has no impact on plant operation.

DISCONNECT SWITCHES	SWITCH LOCATION
1. SG 1 line 2 Atmospheric Dump Valve Solenoid Air Isolation Valves SGB-HY-178A and SGB-HY-178R	RSP
2. SG 2 line 1 Atmospheric Dump Valve Solenoid Air Isolation Valves SGB-HY-185A and SGB-HY-185R	RSP
3. Auxiliary Spray Valve CHB-HV-203	RSP
4. Letdown to Regenerative Heat Exchanger Isolation, CHB-UV-515	RSP
5. Reactor Coolant Pump Controlled Bleedoff, CHB-HV-505	RSP
6. Auxiliary Feedwater Pump B to SG 1 Control Valve, AFB-HV-30	RSP
7. Auxiliary Feedwater Pump B to SG 2 Control Valve, AFB-HV-31	RSP
8. Auxiliary Feedwater Pump B to SG 1 Block Valve, AFB-UV-34	RSP
9. Auxiliary Feedwater Pump B to SG 2 Block Valve, AFB-UV-35	RSP
10. Pressurizer Backup Heaters Banks B10, B18, A05 Control	RSP
11. Safety Injection Tank 2A Vent Control SIB-HV-613	RSP
12. Safety Injection Tank 2B Vent Control SIB-HV-623	RSP
13. Safety Injection Tank 1A Vent Control SIB-HV-633	RSP
14. Safety Injection Tank 1B Vent Control SIB-HV-643	RSP
15. Safety Injection Tank Vent Valves Power Supply SIB-HS-18A	RSP
16. SG 1 line 2 Atmospheric Dump Valve Solenoid Air Isolation Valves SGD-HY-178B and SGD-HY-178S	RSP
17. SG 2 line 1 Atmospheric Dump Valve Solenoid Air Isolation Valves SGD-HY-185B and SGD-HY-185S	RSP
18. Control BLDG Battery Room D Essential Exhaust Fan 'HJB-J01A'	PHB-M3205
19. Control BLDG Battery Room B Essential Exhaust Fan 'HJB-J01B'	PHB-M3205
20. Battery Charger D Control Room Circuits PKD-H14	PHB-M3209 AND PKD-H14
21. ESF Switchgear Room Essential AHU HJB-Z03	PHB-M3205
22. LPSI Pump SIB-P01 Breaker Control	PBB-MS04F
23. Diesel Generator B Breaker Control	PBB-S04B
24. Essential Spray Pond Pump SPB-P01 Breaker Control	PBB-S04C

DISCONNECT SWITCHES	SWITCH LOCATION
25. Essential Chiller ECB-E01 Breaker Control	PBB-S04G
26. E-PBB-S04J 4.16KV Feeder Breaker to 480V Load Center PGB-L32	PBB-S04J
27. E-PBB-S04H 4.16KV Feeder Breaker to 480V Load Center PGB-L34	PBB-S04H
28. E-PBB-S04N 4.16KV Feeder Breaker to 480V Load Center PGB-L36	PBB-S04N
29. Auxiliary Feedwater Pump AFB-P01 Breaker Control	PBB-S04S
30. Essential Cooling Water Pump EWB-P01 Breaker Control	PBB-S04M
31. E-PGB-L32B2 480V Main Supply Breaker to Load Center PGB-L32	PGB-L32B2
32. E-PGB-L34B2 480V Main Supply Breaker to Load Center PGB-L34	PGB-L34B2
33. E-PGB-L36B2 480V Main Supply Breaker to Load Center PGB-L36	PGB-L36B2
34. Charging Pump No. 2 CHB-P01 Supply Breaker CHB-P01	PGB-L32C41
35. Diesel Engine Control Switch HS-2A	DGB-C01
36. Diesel Engine Control Switch HS-2B	DGB-C01
37. Diesel Generator Control Switch HS-2	DGB-C01
38. Diesel Generator Essential Exhaust Fan HDB-J01	DGB-C01
39. Diesel Generator Fuel Oil Transfer Pump DFB-P01	DGB-C01
40. Battery Charger BD Control Room Circuits PKB-H16	PHB-M3425
41. Battery Charger B Control Room Circuits PKB-H12	PHB-M3627
42. 125 VDC Battery B Breaker Control Room Circuits	PKB-M4201
43. 125 VDC Battery D Breaker Control Room Circuits	PKD-M4401
44. CS Pump B Discharge to SD HX B SIB-HV-689	PHB-M3804
45. Shutdown Cooling LPSI Suction SIB-HV-656	PHB-M3611
46. LPSI-CS from SD HX B X-Tie SIB-HV-695	PHB-M3810
47. Shutdown Cooling Warmup Bypass SIB-HV-690	PHB-M3806
48. LPSI-CS to SD HX B Crosstie SIB-HV-694	PHB-M3416
49. SD HX "B" to RC Loops 2A/2B SIB-HV-696	PHB-M3416

DISCONNECT SWITCHES	SWITCH LOCATION
50. LPSI-SD HX "B" Bypass SIB-HV-307	PHB-M3803
51. LPSI Pump "B" Recirc SIB-UV-668	PHB-M3611
52. LPSI Pump "B" Suction from RWT SIB-HV-692	PHB-M3805
53. SD Cooling LPSI Pump "B" Suction SIB-UV-652	PHB-M3611
54. SD Cooling LPSI Pump "B" Suction SID-UV-654	PKD-B44
55. LPSI Header "B" to RC Loop 2A SIB-UV-615	PHB-M3611
56. LPSI Header "B" to RC Loop 2B SIB-UV-625	PHB-M3640
57. VCT Outlet Isolation CHN-UV-501	NHN-M7208
58. RWT Gravity Feed CHE-HV-536	NHN-M7209
59. Shutdown Cooling Temperature Control SIB-HV-658	PHB-M3416
60. Shutdown Cooling Heat Exchanger Bypass Valve SIB-HV-693	PHB-M3416
61. 4.16 KV Bus PBB-S04 Feeder from XFMR NBN-X04	PBB-S04K
62. 4.16 KV Bus PBB-S04 Feeder from XFMR NBN-X03	PBB-S04L
63. Electrical Penetration Room B ACU HAB-Z06	PHB-M3640
64. Control Room HVAC Isolation Dampers HJB-M01/HJB-M55	RSP
65. O.S.A. Supply Damper HJB-M02	RSP
66. O.S.A. Supply Damper HJB-M03	RSP
67. R.C.S. Sample Isolation Valve SSA-UV-203	SSA-J04
68. R.C.S. Sample Isolation Valve SSB-UV-200	RSP
69. 125 VDC Battery A Breaker Control Room Circuits	PKA-M4101

CONTROL CIRCUITS	SWITCH LOCATION
1. Auxiliary Feedwater Pump B to S/G 1 Isolation Valve AFB-UV-34	RSP
2. Auxiliary Feedwater Pump B to S/G 1 Control Valve AFB-HV-30	RSP
3. Auxiliary Feedwater Pump B to S/G 2 Isolation Valve AFB-UV-35	RSP
4. Auxiliary Feedwater Pump B to S/G 2 Control Valve AFB-HV-31	RSP
5. Auxiliary Feedwater Pump AFB-P01	PBB-S04S
6. Charging Pump No. 2 CHB-P01	PGB-L32C4
7. Pressurizer Auxiliary Spray Valve CHB-HV-203	RSP
8. Pressurizer Backup Heater Bank	RSP
9. Letdown to Regen HX Isolation Valve CHB-UV-515	RSP
10. RCP Cont Bleedoff Valve CHB-UV-505	RSP
11. Volume Control Tank Outlet Isolation Valve CHN-UV-501	NHN-M7208
12. RWT Gravity Feed Isolation Valve CHE-HV-536	NHN-M7209
13. S/G 1 line 2 Atmospheric Dump Valve Controller SGB-HIC-178B	RSP
14. S/G 1 line 2 Atmospheric Dump Valve Solenoid Air Isolation Valves SGB-HY-178A and SGB-HY-178R	RSP
15. S/G 1 line 2 Atmospheric Dump Valve Solenoid Air Isolation Valves SGD-HY-178B and SGD-HY-178S	RSP
16. S/G 2 line 2 Atmospheric Dump Valve Controller SGB-HIC-185B	RSP
17. S/G 2 line 1 Atmospheric Dump Valve Solenoid Air Isolation Valves SGB-HY-185A and SGB-HY-185R	RSP
18. S/G 2 line 1 Atmospheric Dump Valve Solenoid Air Isolation Valves SGD-HY-185B and SGD-HY-185S	RSP
19. Diesel Generator B Output Breaker	PBB-S04B
20. Diesel Generator Building Essential Exhaust Fan HDB-J01	DGB-B01
21. Diesel Generator B Fuel Oil Transfer Pump DFB-P01	DGB-B01
22. E-PBB-S04H 4.16 KV Feeder Breaker to 480V Load Center PGB-L34	PBB-S04H
23. E-PBB-S04J 4.16KV Feeder Breaker to 480V Load Center PGB-L32	PBB-S04J
24. E-PBB-S04N 4.16KV Feeder Breaker to 480V Load Center PGB-L36	PBB-S04N
25. E-PGB-L32B2 480V Main Supply Breaker To Load Center PGB-L32	PGB-L32B2
26. E-PGB-L34B2 480V Main Supply Breaker To Load Center PGB-L34	PGB-L34B2

CONTROL CIRCUITS	SWITCH LOCATION
27. E-PGB-L36 480V Supply Breaker To Load Center PGB-L36	PGB-L36B2 /
28. Battery Charger PKB-H12 Supply Breaker	PHB-M3627
29. Battery Charger PKD-H14 Supply Breaker	PHB-M3209
30. Backup Battery Charger PKB-H16 Supply Breaker	PHB-M3425
31. Essential Spray Pond Pump SPB-P01	PBB-S04C
32. Essential Cooling Water Pump EWB-P01	PBB-S04M
33. Essential Chilled Water Chiller ECB-E01	PBB-S04G
34. Battery Room D Essential Exhaust Fan HJB-J01A	PHB-M3206
35. Battery Room B Essential Exhaust Fan HJB-J01B	PHB-M3207
36. ESF Switchgear Room B Essential AHU HJB-Z03	PHB-M3203
37. Electrical Penetration Room B ACU Fan HAB-Z06	PHB-M3631
38. SIT Vent Valves Power Supply SIB-HS-18A/B	RSP
39. SIT 2A Vent Valve SIB-HV-613	RSP
40. SIT 2B Vent Valve SIB-HV-623	RSP
41. SIT 1A Vent Valve SIB-HV-633	RSP
42. SIT 1B Vent Valve SIB-HV-643	RSP
43. LPSI Pump B SIB-P01	PBB-S04F
44. Containment Spray Pump B Discharger to SD HX "B" Valve SIB-HV-689	PHB-M3804
45. LPSI Containment Spray from SD HX "B" X-tie Valve SIB-HV-695	PHB-M3810
46. Shutdown Cooling LPSI Suction Valve SIB-UV-656	PHB-M3605
47. Shutdown Cooling Warmup Bypass Valve SIB-HV-690	PHB-M3806
48. LPSI Containment Spray to SD HX "B" X-tie Valve SIB-HV-694	PHB-M3414

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3.3.3.6 Table 3.3-10

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a purely administrative change to technical specifications.

This change will correctly associate the action statements to table 3.3-10.

TABLE ~~4.3-7~~

ACTION STATEMENTS

ACTION 29 - With the number of OPERABLE Channels one less than the Required Number of Channels in Table 3.3-10, either restore the Inoperable Channel(s) to OPERABLE status within 7 days, or be in HOT SHUTDOWN within the next 12 hours.

ACTION 30 - With the number of OPERABLE Channels one less than the Minimum Channels OPERABLE in Table 3.3-10, either restore the Inoperable Channel(s) to OPERABLE status within 48 hours or be in at least HOT SHUTDOWN within the next 12 hours.

ACTION 31 - With the number of OPERABLE Channels one less than the Required Number of Channels, either restore the system to OPERABLE status within 7 days if repairs are feasible without shutting down or prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

ACTION 32 - With the number of OPERABLE Channels one less than the Minimum Channels OPERABLE in Table 3.3-10, either restore the inoperable channel(s) to OPERABLE status within 48 hours if repairs are feasible without shutting down or:

1. Initiate an alternate method of monitoring the reactor vessel inventory;

2. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status; and

3. Restore the system to OPERABLE status at the next scheduled refueling.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.6.2.2

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety; and

(B) The proposed amendment is a purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.

This change will make this Specification consistent with Specification 3.6.2.1 which prescribes operability requirements for the containment spray system. The containment spray system must be operable before the iodine removal system can perform its function.

CONTAINMENT SYSTEMS

IODINE REMOVAL SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.2.2 The iodine removal system shall be OPERABLE with:

a. An spray chemical addition tank containing a level of between 90% and 100% (816 and 896 gallons) of between 33% and 35% by weight N_2H_4 solution, and

b. Two spray chemical addition pumps each capable of adding N_2H_4 solution from the spray chemical addition tank to a containment spray system pump flow.

APPLICABILITY: MODES 1, 2, 3, and 4.*

ACTION:

With the iodine removal system inoperable, restore the system to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours; restore the iodine removal system to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.2.2 The iodine removal system shall be demonstrated OPERABLE:

a. At least once per 31 days by verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.

b. At least once per 6 months by:

1. Verifying the contained solution volume in the tank, and

2. Verifying the concentration of the N_2H_4 solution by chemical analysis.

c. By verifying that on recirculation flow, each spray chemical addition pump develops a discharge pressure of 100 psig when tested pursuant to Specification 4.0.5.

d. At least once per 18 months, during shutdown, by
1. Verifying that each automatic valve in the flow path actuates to its correct position on a containment spray actuation (CSAS) test signal, and
2. Verifying that each spray chemical addition pump starts automatically on a CSAS test signal.

* WHEN THE CONTAINMENT IS REQUIRED TO BE OPERABLE.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.7.9

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety; and

(B) The proposed amendment is a purely administrative change to technical specifications.

4.7.9.a This change corrects the title of this section. The section clearly addresses snubber types rather than inspection types.

4.7.9.c This change corrects a typo in the word susceptible, and deletes a sentence which does not apply since there are no such snubbers at PVNGS.

4.7.9.d This change clarifies the sentence and improves the grammar.

4.7.9.f.4 This section should be deleted since there are no such snubbers at PVNGS.

3/4.7.9 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.9 All hydraulic and mechanical snubbers shall be OPERABLE. The only snubbers excluded from this requirement are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

APPLICABILITY: MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.

ACTION:

With one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.9g. on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.9 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. ~~Inspection~~ SNUBBER Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these groups (inaccessible and accessible) may be inspected independently according to the schedule below. The first inservice visual inspection of each type of snubber shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all hydraulic and mechanical snubbers. If all snubbers of each type are found OPERABLE during the first inservice visual inspection, the second inservice visual inspection of that type shall be performed at the first refueling outage. Otherwise, subsequent visual inspections of a given type shall be performed in accordance with the following schedule:

No. of Inoperable Snubbers of Each Type per Inspection Period	Subsequent Visual Inspection Period*#
0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3,4	124 days ± 25%
5,6,7	62 days ± 25%
8 or more	31 days ± 25%

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: (1) there are no visible indications of damage or impaired OPERABILITY and (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are secure. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, provided that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type on that system that may be generically ~~suspectible;~~ SUSCEPTIBLE and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specifications 4.7.9f. When a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be declared inoperable and cannot be determined OPERABLE via functional testing unless the test is started with the piston in the as-found setting, extending the piston rod in the tension mode direction. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers. Snubbers which appear inoperable during an area post maintenance inspection, area walkdown, or Transient Event Inspection shall not be considered inoperable for the purpose of establishing the Subsequent Visual Inspection Period provided that the cause of the inoperability is clearly established and remedied for that particular snubber and for the other snubbers, irrespective of type, that may be generally susceptible.

d. Transient Event Inspection

An inspection shall be performed of all hydraulic and mechanical snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data ~~and a~~ A visual inspection of the systems SHALL BE MADE within 6 months following such an event. In addition to satisfying

*The inspection interval for each type of snubber on a given system shall not be lengthened more than one step at a time unless a generic problem has been identified and corrected; in that event the inspection interval may be lengthened one step the first time and two steps thereafter if no inoperable snubbers of that type are found on that system.

#The provisions of Specification 4.0.2 are not applicable.

SURVEILLANCE REQUIREMENTS (Continued)

as the snubber is tested. If the point plotted falls on or below the "Accept" line, testing of that type of snubber may be terminated. If the point plotted falls above the "Accept" line, testing must continue until the point falls in the "Accept" region or all the snubbers of that type have been tested.

The representative sample selected for the functional test sample plans shall be randomly selected from the snubbers of each type and reviewed before beginning the testing. The review shall ensure as far as practical that they are representative of the various configurations, operating environments, range of size, and capacity of snubbers of each type. Snubbers placed in the same locations as snubbers which failed the previous functional test shall be retested at the time of the next functional test but shall not be included in the sample plan. If during the functional testing, additional sampling is required due to failure of only one type of snubber, the functional testing results shall be reviewed at the time to determine if additional samples should be limited to the type of snubber which has failed the functional testing.

f. Functional Test Acceptance Criteria

The snubber functional test shall verify that:

1) Activation (restraining action) is achieved within the specified range in both tension and compression;

2) Snubber bleed, or release rate where required, is present in both tension and compression, within the specified range;

3) For mechanical snubbers, the force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel; and

4) For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement.

Testing methods may be used to measure parameters indirectly or parameters other than those specified if those results can be correlated to the specified parameters through established methods.

g. Functional Test Failure Analysis

An engineering evaluation shall be made of each failure to meet the functional test acceptance criteria to determine the cause of the failure. The results of this evaluation shall be used, if applicable, in selecting snubbers to be tested in an effort to determine the OPERABILITY of other snubbers irrespective of type which may be subject to the same failure mode.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.9.11

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety; and

(B) The proposed amendment is a purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.

This change brings these Technical Specifications in agreement with NUREG 0212 Rev. 2. Specifications 3.1.2.1 and 3.1.2.2 adequately provide actions to be taken to supply water for boration flow paths. The exclusion to Specification 3.0.3 was erroneously omitted.

REFUELING OPERATIONS

3/4.9.11 WATER LEVEL - STORAGE POOL

LIMITING CONDITION FOR OPERATION

3.9.11 At least 23 feet of water shall be maintained over the top of irradiated fuel assemblies seated in the storage racks.

APPLICABILITY: Whenever irradiated fuel assemblies are in the storage pool.

ACTION:

With the requirement of the specification not satisfied, suspend all movement of fuel assemblies and crane operations with loads in the fuel storage areas and restore the water level to within its limit within 4 hours. THE PROVISIONS OF SPECIFICATION 3.0.3 ARE NOT APPLICABLE.

SURVEILLANCE REQUIREMENTS

4.9.11 The water level in the storage pool shall be determined to be at least its minimum required depth at least once per 7 days when irradiated fuel assemblies are in the fuel storage pool.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 6.2-1

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety; and

(B) The proposed amendment is a purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.

The revised organization charts reflect pending changes in the Arizona Nuclear Power Project organization.

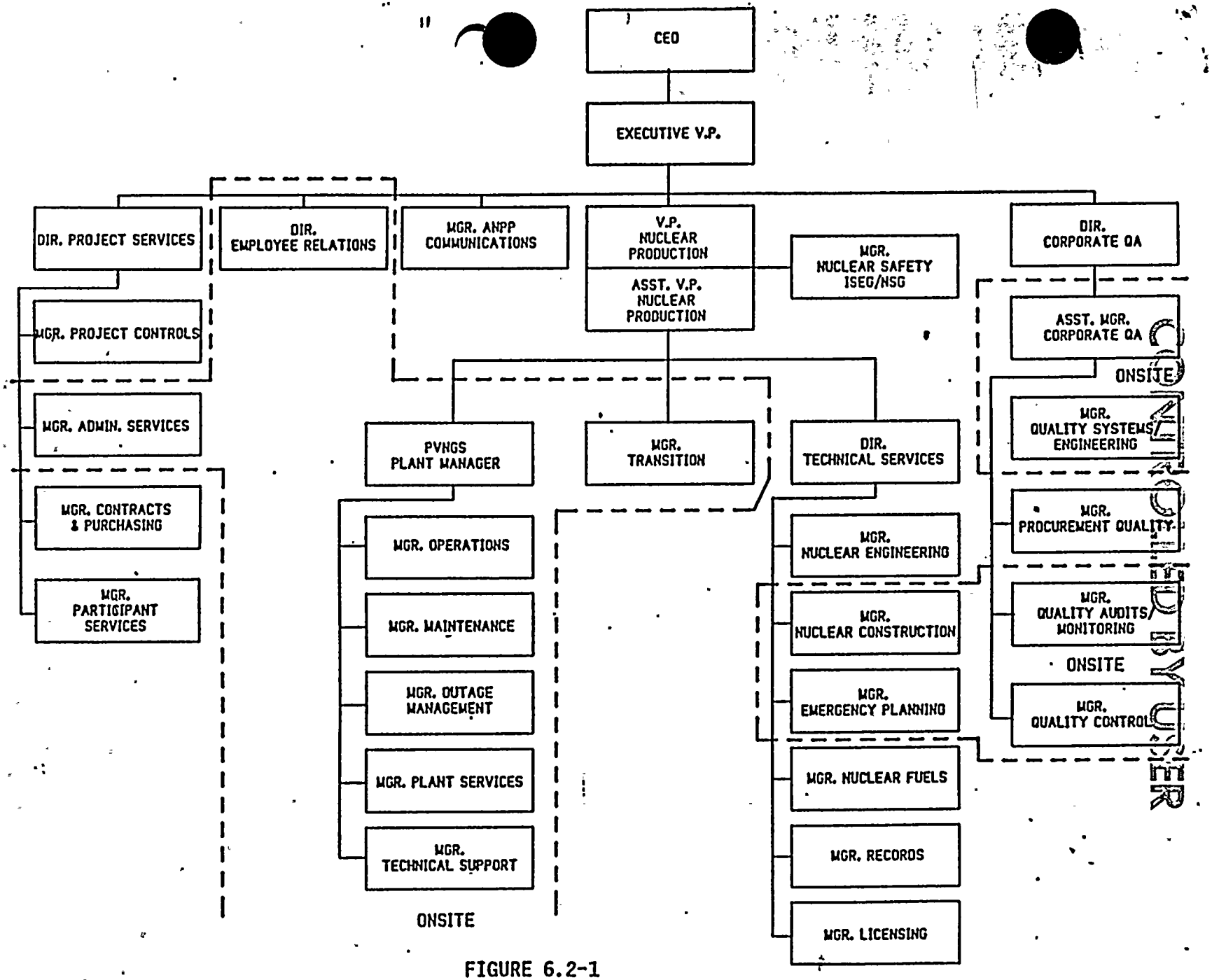
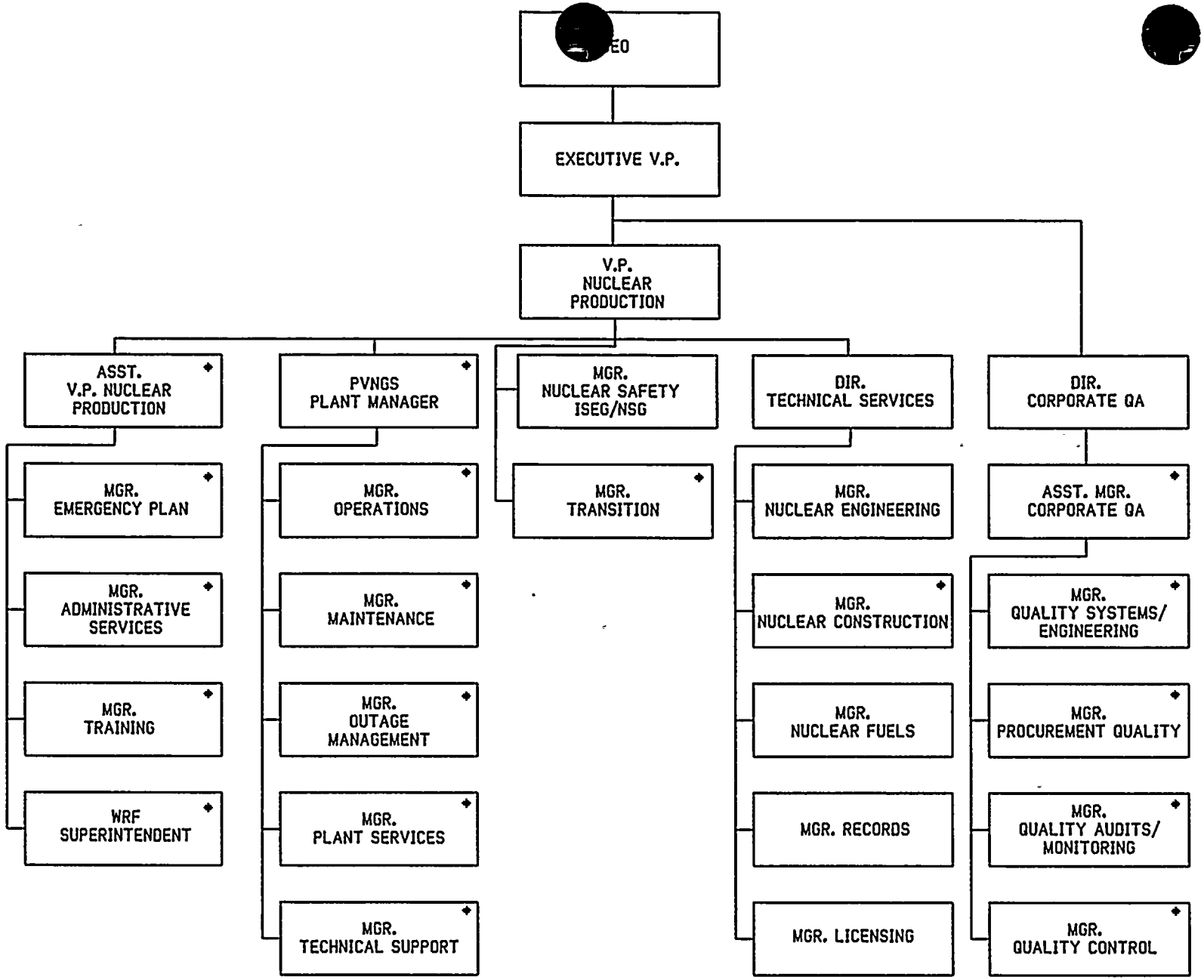


FIGURE 6.2-1

OFFSITE ORGANIZATION

OLD



◆ LOCATED ONSITE

FIGURE 6.2-1
OFFSITE ORGANIZATION

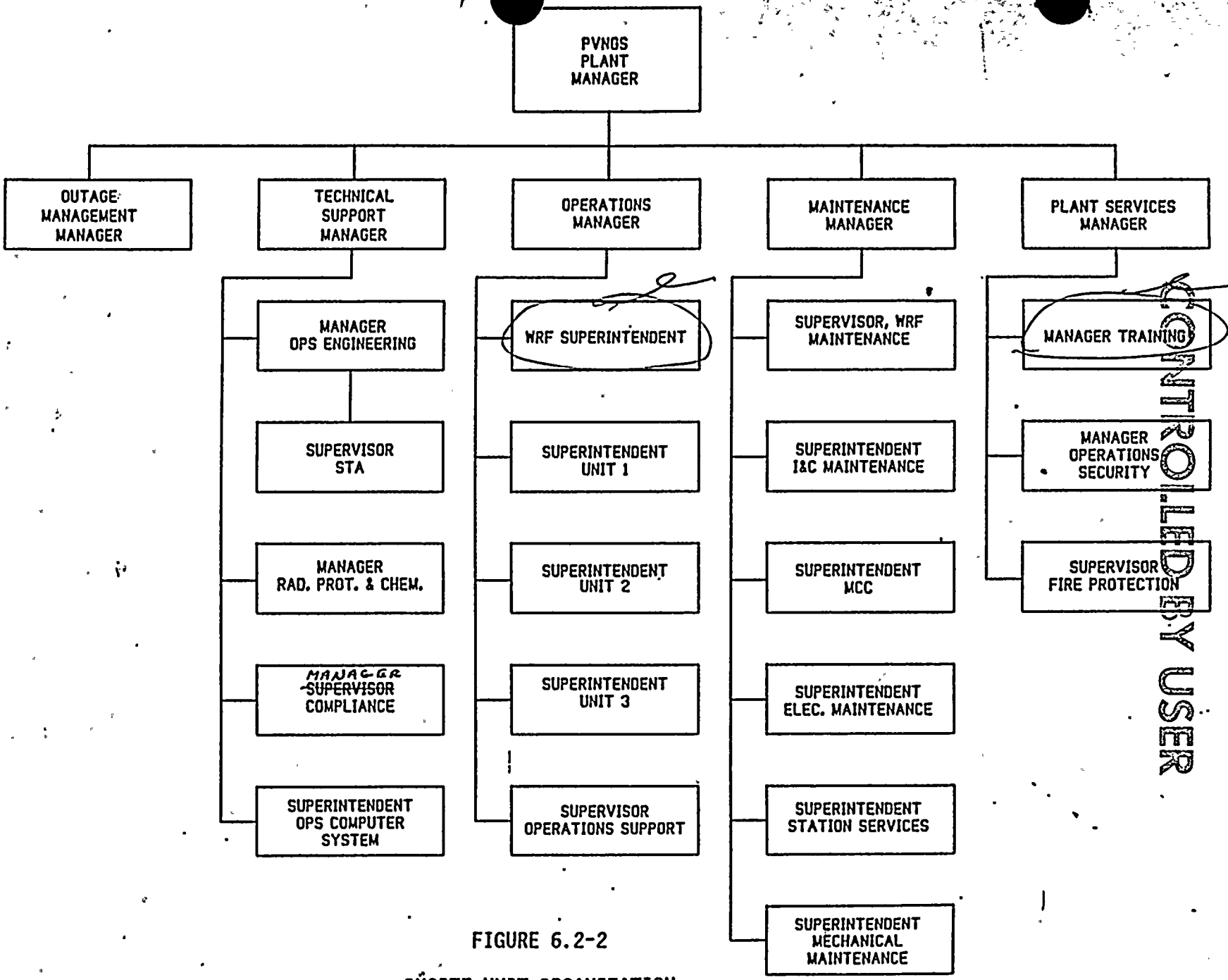


FIGURE 6.2-2

ONSITE UNIT ORGANIZATION

OLD

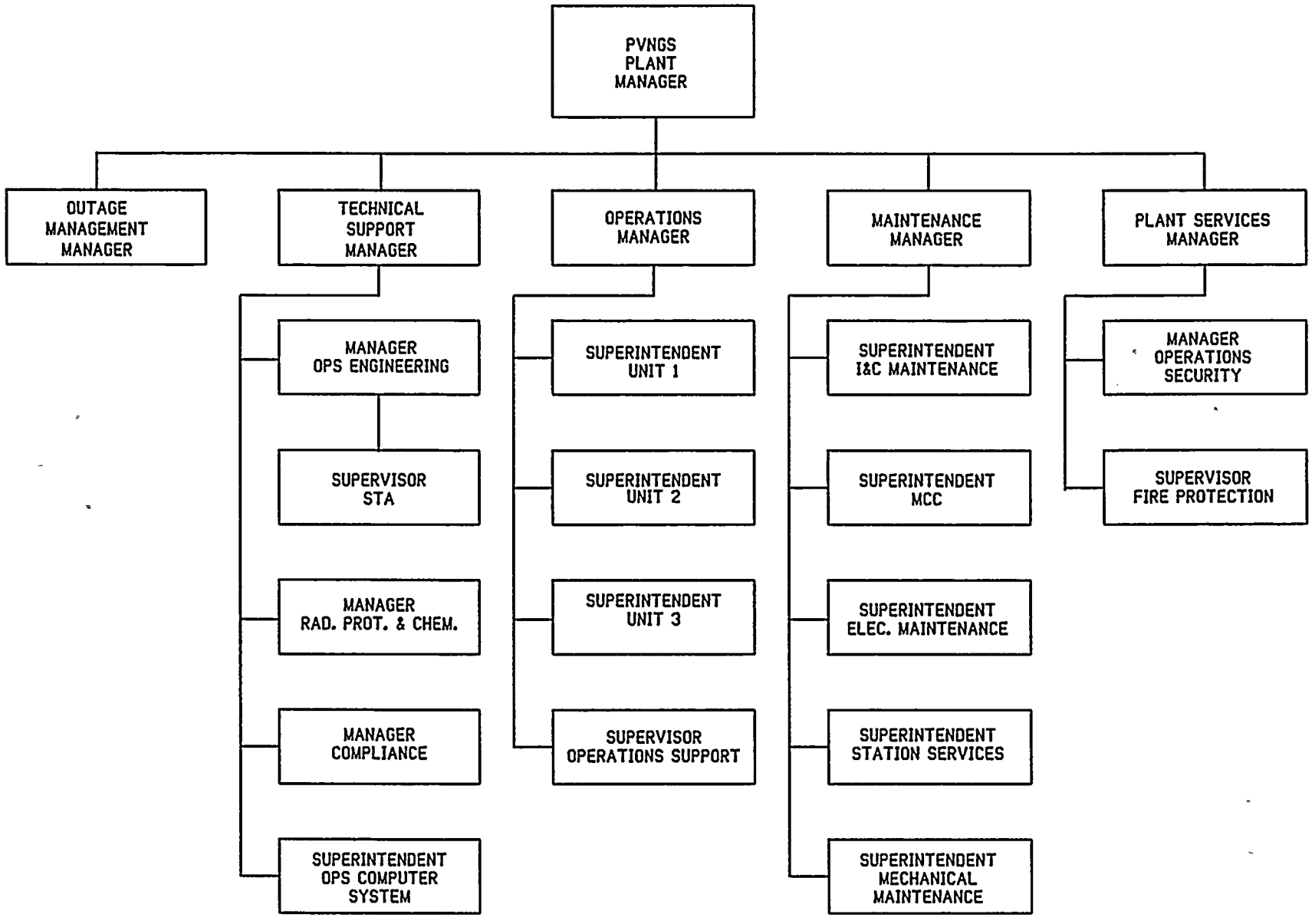


FIGURE 6.2-2
ONSITE UNIT ORGANIZATION

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 6.2.2.2a

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety; and

(B) The proposed amendment is a purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.

This change is in response to a notice of violation and was committed to in our letter ANPP-33926 EEVB/FJH dated 11/5/85. This letter stated that APS would seek an amendment identifying the specific job classifications to which the overtime limitations shall apply.

6.1 RESPONSIBILITY

6.1.1 The PVNGS Plant Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Supervisor, or during his absence from the Control Room, a designated individual per Table 6.2-1, shall be responsible for the Control Room command function. A management directive to this effect, signed by the Vice President-Nuclear Production shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization for unit management and technical support shall be as shown in Figure 6.2-1.

UNIT STAFF

6.2.2.1 The unit organization shall be as shown in Figure 6.2-2 and:

a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.

b. At least one licensed Reactor Operator shall be in the Control Room when fuel is in the reactor. In addition, while the reactor is in MODE 1, 2, 3, or 4, at least one licensed Senior Reactor Operator shall be in the Control Room.

c. A radiation protection technician* shall be onsite when fuel is in the reactor.

d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

e. A site Fire Team of at least five members shall be maintained onsite at all times*. The Fire Team shall not include the Shift Supervisor, the STA, nor the 3 other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.

6.2.2.2 The unit staff working hours shall be as follows:

a. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., Senior Reactor Operators, Reactor Operators, radiation protection technicians, auxiliary operators, and key maintenance personnel.

REPLACE WITH INSERT A

*The radiation protection technician and Fire Team composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

Insert A

a. Administrative procedures shall be developed and implemented to limit the working hours of unit staff in the following job classifications:

1) Shift Supervisors, Assistant Shift Supervisors, Nuclear Operator III, Nuclear Operator II;

2) Electricians, I&C Technicians, Computer Technicians, Plant Mechanics, Refrigeration Technicians;

3) Chemistry Technicians, Radiation Protection Technicians, Radwaste Technicians.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 6.5.3.5

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a purely administrative change to technical specification.

The Pre-Planned Alternate Sampling Program is not required by the Standard Tech. Spec. Review Plan. The design of our high range monitors is consistent with regulatory guidance, therefore, no special Tech. Spec. considerations are necessary.

Deletion of the Pre-Planned Alternate Sampling Program from Technical Specifications

The need to maintain the Pre-Planned Alternate Sampling Program (PASP) as a Technical Specification Program is unnecessary. The PASP has no precedented counterpart in the Standard Technical Specifications. Notification of deficiencies in the Operability status of High Range and Accident Analysis monitors and systems may be achieved by the existing system of Special Report submittals. Enforcement action may be initiated based on the submittals should efforts of the facility staff to correct these situations be found to be repeatedly inadequate.

The existing Pre-Planned Alternate Sampling Program and other pre-planned contingencies should be maintained by the facility outside the scope of Technical Specification requirements.

Regardless of the deletion of PASP as a Technical Specification Program, items I and III on the following table are requested to be deleted for the reasons listed.

In addition, since the Pre-Planned Alternate Sampling Program is no longer a required program, it need not be audited by NSG.

TECH SPEC #	TABLE #	ACTION #	REQUIRED CHANGE	REASON
I. 3.3.3.1	3.3-6	27.(1)	Delete Section 1 and change sections 2 and 3 to 1 and 2 respectively.	Pre-planned Alternates to these monitors are found in EPIP's and are implemented at all times.
II. 3.3.3.1	3.3-6 p3-39	28(1)	Delete Section 1 and change section 2 to follow the phrase "within 7 days".	Current Regulatory guidance does not require a backup system for a manual PASS.
	p3-38	———	Instrument 3-Delete ### in its entirety	Any definition requirements not contained in Tech Specs can be found in the Station Manual.
III. 3.3.3.9	3.3-13	37(a)	Delete "a." change to: a. Place movable air monitors in line. b. Take grab samples at least once per 12 hours	Regardless of the deletion of PASP, this should be changed as stated since existing "a" is not an appropriate alternative to "b".
IV. 3.3.3.9	3.3-13	42(a)	Delete "a" change "b" statement to follow the word "or".	PASP will be implemented by Station Manual Procedures.
V. 6.5.3.5	———	———	Delete item "1". from audit list.	If PASP is not a program it need not be audited by NSG.
VI. 6.8.1	———	———	Delete item "k" from list. Redesignate remaining listings to follow in order beginning with k.	If PASP is not a Tech Spec Program its implementation should not be required by Tech Specs.
VII. 6.16	———	———	Delete in its entirety.	Deletion requested per this submittal.

AUDITS (Continued)

g. The fire protection equipment and program implementation at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.

h. The radiological environmental monitoring program and the results thereof at least once per 12 months.

i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.

j. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.

k. The performance of activities required by the Operations Quality Assurance Criteria Manual to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

l. The Pre-planned Alternate Sampling Program and implementing procedures at least once per 24 months.

AUTHORITY

6.5.3.6 The NSG shall report to and advise the Manager of Nuclear Safety on those areas of responsibility specified in Specifications 6.5.3.4 and 6.5.3.5.

RECORDS

6.5.3.7 Records of NSG activities shall be prepared and maintained. Report of reviews and audits shall be prepared monthly for the Manager of Nuclear Safety who will distribute it to the Vice President-Nuclear Production, PVNGS Plant Manager, and to the management positions responsible for the areas audited.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified pursuant to the requirements of Section 50.72 to 10 CFR Part 50, and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and

b. Each REPORTABLE EVENT shall be reviewed by the PRB, and the results of this review shall be submitted to the Supervisor of Nuclear Safety Group and the Vice President-Nuclear Production.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 6.8.1

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a purely administrative change to technical specification.

The Pre-Planned Alternate Sampling Program is not required by the Standard Tech. Spec. Review Plan. The design of our high range monitors is consistent with regulatory guidance, therefore, no special Tech. Spec. considerations are necessary.

Deletion of the Pre-Planned Alternate Sampling Program from Technical Specifications

The need to maintain the Pre-Planned Alternate Sampling Program (PASP) as a Technical Specification Program is unnecessary. The PASP has no precedented counterpart in the Standard Technical Specifications. Notification of deficiencies in the Operability status of High Range and Accident Analysis monitors and systems may be achieved by the existing system of Special Report submittals. Enforcement action may be initiated based on the submittals should efforts of the facility staff to correct these situations be found to be repeatedly inadequate.

The existing Pre-Planned Alternate Sampling Program and other pre-planned contingencies should be maintained by the facility outside the scope of Technical Specification requirements.

Regardless of the deletion of PASP as a Technical Specification Program, items I and III on the following table are requested to be deleted for the reasons listed.

In addition, if the Pre-Planned Alternate Sampling Program, is not a Tech. Spec. program, its implementation should not be required by the tech. specs.

TECH SPEC #	TABLE #	ACTION #	REQUIRED CHANGE	REASON
I. 3.3.3.1	3.3-6	27.(1)	Delete Section 1 and change sections 2 and 3 to 1 and 2 respectively.	Pre-planned Alternates to these monitors are found in EPIP's and are implemented at all times.
II. 3.3.3.1	3.3-6 p3-39	28(1)	Delete Section 1 and change section 2 to follow the phrase "within 7 days".	Current Regulatory guidance does not require a backup system for a manual PASS.
	p3-38	———	Instrument 3-Delete ### in its entirety	Any definition requirements not contained in Tech Specs can be found in the Station Manual.
III. 3.3.3.9	3.3-13	37(a)	Delete "a." change to: a. Place movable air monitors in line. b. Take grab samples at least once per 12 hours	Regardless of the deletion of PASP, this should be changed as stated since existing "a" is not an appropriate alternative to "b".
IV. 3.3.3.9	3.3-13	42(a)	Delete "a" change "b" statement to follow the word "or".	PASP will be implemented by Station Manual Procedures.
V. 6.5.3.5	———	———	Delete item "1". from audit list.	If PASP is not a program it need not be audited by NSG.
VI. 6.8.1	———	———	Delete item "k" from list. Redesignate remaining listings to follow in order beginning with k.	If PASP is not a Tech Spec Program its implementation should not be required by Tech Specs.
VII. 6.16	———	———	Delete in its entirety.	Deletion requested per this submittal.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President-Nuclear Production, PVNGS Plant Manager and Supervisor of Nuclear Safety Group shall be notified within 24 hours.

b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PRB. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems, or structures, and (3) corrective action taken to prevent recurrence.

c. The Safety Limit Violation Report shall be submitted to the Commission, the Supervisor of the NSG and the Vice President-Nuclear Production within 30 days of the violation.

d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, and those required for implementing the requirements of NUREG-0737.

b. Refueling operations.

c. Surveillance and test activities of safety-related equipment.

d. Security Plan implementation.

e. Emergency Plan implementation.

f. Fire Protection Program implementation.

g. Modification of Core Protection Calculator (CPC) Addressable Constants.

NOTE: Modification to the CPC Addressable Constants based on information obtained through the Plant Computer - CPC data link shall not be made without prior approval of the PRB.

h. PROCESS CONTROL PROGRAM implementation.

i. OFFSITE DOSE CALCULATION MANUAL implementation.

j. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

k. Pre-planned Alternate Sampling Program implementation.

k.X. Secondary water chemistry program implementation.

NOTE: The licensee shall perform a secondary water chemistry monitoring and control program that is in conformance with the program discussed in Section 10.3.4.1 of the CESSAR FSAR or another NRC approved program.

l. Post-Accident Sampling System implementation.*

m. Settlement Monitoring Program implementation.

NOTE: The licensee shall maintain a settlement monitoring program throughout the life of the plant in accordance with the program presented in Table 2.5-18 of the PVNGS FSAR or another NRC approved program.

n. CEA Symmetry Test Program implementation

NOTE: The licensee shall perform a CEA symmetry test program in conformance with the program discussed in Section 4.2.2 of the PVNGS SER dated November 11, 1981.

o. Fuel Assembly Surveillance Program Implementation

NOTE: The licensee shall perform a fuel assembly surveillance program in conformance with the program discussed in Section 4.2.4 of the PVNGS SER dated November 11, 1981.

6.8.2 Each program or procedure of Specification 6.8.1, and changes thereto, shall be reviewed as specified in Specification 6.5 and approved prior to implementation. Programs, administrative control procedures and implementing procedures shall be approved by the PVNGS Plant Manager, or designated alternate who is at supervisory level or above. Programs and procedures of Specification 6.8.1 shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of Specification 6.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the plant supervisory staff, at least one of whom is a Shift Supervisor or Assistant Shift Supervisor with an SRO on the affected unit.

c. The change is documented; reviewed in accordance with Specification 6.5.2 and approved by the PVNGS plant manager or cognizant department head, as designated by the PVNGS plant manager, within 14 days of implementation.

6.8.4 The following programs shall be established, implemented, maintained, and shall be audited under the cognizance of the NSG at least once per 24 months:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the recirculation portion of the high pressure safety injection system, the shutdown cooling portion of the low pressure safety injection system, the post-accident sampling subsystem of the

*Not required until prior to exceeding 5% of RATED THERMAL POWER.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 6.16

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety; and

(B) The proposed amendment is a purely administrative change to technical specification.

The Pre-Planned Alternate Sampling Program is not required by the Standard Technical Specification Review Plan. The design of our high range monitors is consistent with regulatory guidance, therefore, no special tech. spec. considerations are necessary.

Deletion of the Pre-Planned Alternate Sampling Program from Technical Specifications

The need to maintain the Pre-Planned Alternate Sampling Program (PASP) as a Technical Specification Program is unnecessary. The PASP has no precedented counterpart in the Standard Technical Specifications. Notification of deficiencies in the Operability status of High Range and Accident Analysis monitors and systems may be achieved by the existing system of Special Report submittals. Enforcement action may be initiated based on the submittals should efforts of the facility staff to correct these situations be found to be repeatedly inadequate.

The existing Pre-Planned Alternate Sampling Program and other pre-planned contingencies should be maintained by the facility outside the scope of Technical Specification requirements.

The following table is a listing of items to be deleted from Unit I Technical Specifications as reference to pre-planned alternatives.

Regardless of the deletion of PASP as a Technical Specification Program, items I and III on the following table are requested to be deleted for the reasons listed.

TECH SPEC #	TABLE #	ACTION #	REQUIRED CHANGE	REASON
I. 3.3.3.1	3.3-6	27.(1)	Delete Section 1 and change sections 2 and 3 to 1 and 2 respectively.	Pre-planned Alternates to these monitors are found in EPIP's and are implemented at all times.
II. 3.3.3.1	3.3-6 p3-39	28(1)	Delete Section 1 and change section 2 to follow the phrase "within 7 days".	Current Regulatory guidance does not require a backup system for a manual PASS.
	p3-38	———	Instrument 3-Delete ### in its entirety	Any definition requirements not contained in Tech Specs can be found in the Station Manual.
III. 3.3.3.9	3.3-13	37(a)	Delete "a." change to: a. Place movable air monitors in line. b. Take grab samples at least once per 12 hours	Regardless of the deletion of PASP, this should be changed as stated since existing "a" is not an appropriate alternative to "b".
IV. 3.3.3.9	3.3-13	42(a)	Delete "a" change "b" statement to follow the word "or".	PASP will be implemented by Station Manual Procedures.
V. 6.5.3.5	———	———	Delete item "1". from audit list.	If PASP is not a program it need not be audited by NSG.
VI. 6.8.1	———	———	Delete item "k" from list. Redesignate remaining listings to follow in order beginning with k.	If PASP is not a Tech Spec Program its implementation should not be required by Tech Specs.
VII. 6.16	———	———	Delete in its entirety.	Deletion requested per this submittal.

MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS, AND SOLID WASTE TREATMENT SYSTEMS (Continued)

5) An evaluation of the change, which shows the expected maximum exposures to a MEMBER OF THE PUBLIC in the UNRESTRICTED AREA and to the general population that differ from those previously estimated in the license application and amendments thereto;

6) A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made; and

7) An estimate of the exposure to plant operating personnel as a result of the change.

6.16 PRE-PLANNED ALTERNATE SAMPLING PROGRAM (PASP)

6.16.1 The PASP shall be approved by the Regional Administrator, U.S. NRC Region V, prior to implementation.

6.16.2 Licensee-initiated changes to the PASP:

Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:

1) Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information; and

2) A determination that the change did not reduce the overall effectiveness of the Gaseous Effluent Sampling Program.

3) A determination that the change did not reduce the overall effectiveness of the Post Accident Sampling System.

4) A determination that the change did not reduce the overall effectiveness of the post-accident High Range Effluent Monitors.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3.1.1.3

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety:

(B) The proposed amendment is a change that constitutes an additional limitation, restriction or control not presently included in the technical specifications.

The proposed change revises Technical Specification 3.1.1.3, Moderator Temperature Coefficient. Technical Specification 3.1.1.3 establishes the range of allowable moderator temperature coefficient (MTC) values as a function of average moderator temperature. MTC expresses variation in moderator reactivity per unit change in moderator temperature.

Technical Specification 3.1.1.3 is required to assure that actual (measured) values of MTC occurring during Unit 2 Cycle 1 are bounded by values assumed in the safety analyses. The proposed change revises the most negative value of MTC (appearing on Figure 3.1-1) from -3.5×10^{-4} Δ p/°F to -3.0×10^{-4} Δ p/°F.

The proposed change in the most negative allowable MTC reflects a change from the existing value; which is a number selected to bound anticipated equilibrium cycle operation, to a new value that bounds anticipated Cycle 1, but not necessarily equilibrium cycle, MTC values. The change is required at this time to validate a Palo Verde FSAR steam line break analysis which uses a less negative value of MTC than was used for the corresponding CESSAR analysis.

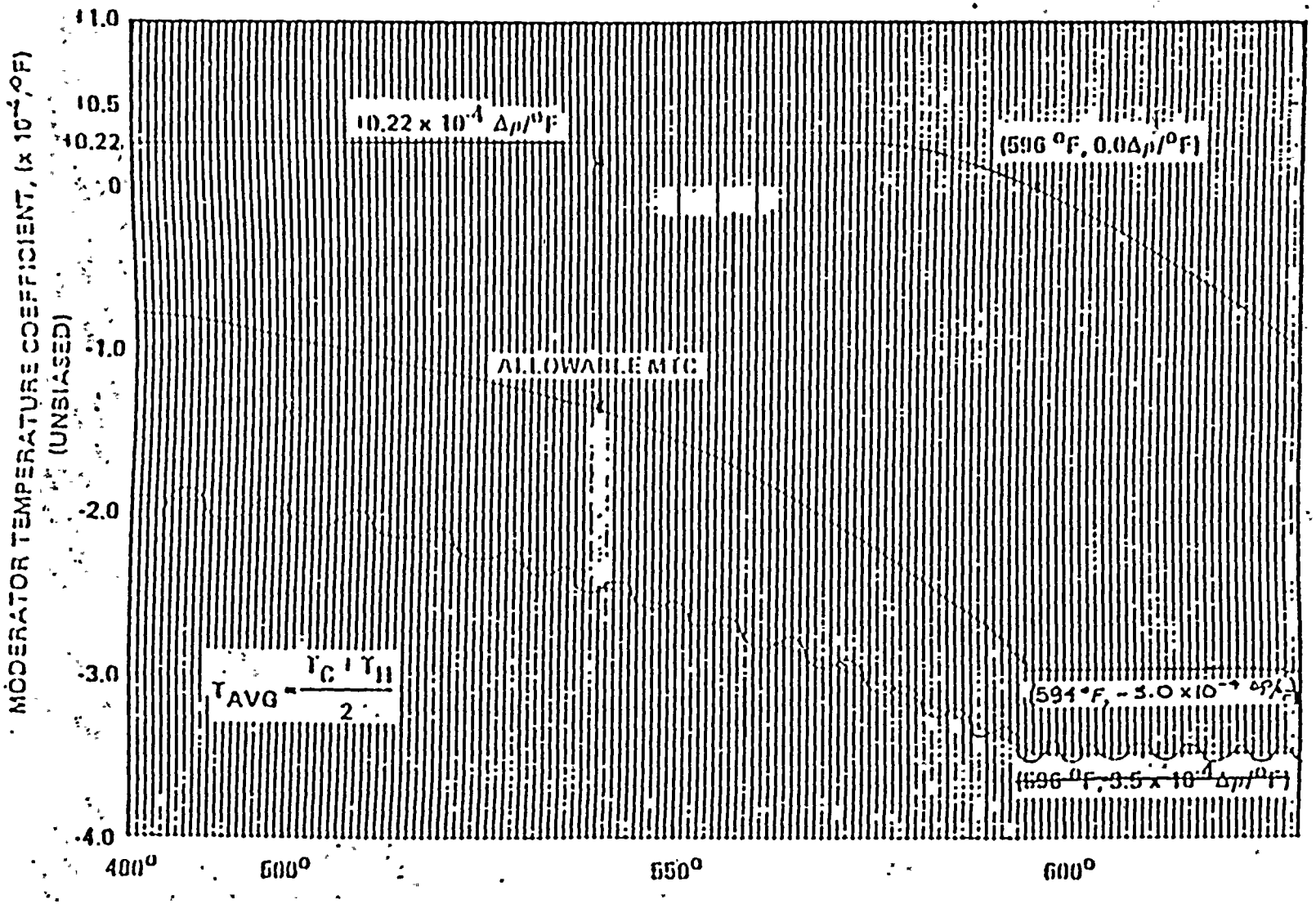
Operation of Palo Verde Unit 2 Cycle 1 in accordance with this proposed change constitutes no significant hazards consideration because the amended technical specification reflects a more restrictive range of allowable values for the subject parameter.

In response to the no significant hazards consideration, the proposed change will in fact reduce the consequences of accidents which are affected by values permitted by this technical specification, since the new allowable range will be more restrictive than the existing allowable range.

No change to operating procedures is involved; thus no new path is created which may lead to a new or different kind of accident. Furthermore, although the proposed change will impose a greater restriction on the range of allowable values for the subject parameter, no constraints on the operation of the associated fuel cycle will be imposed because the allowable limits are still anticipated to bound those which will actually occur.

The proposed amendment will not impact any characteristics of the fuel cycle since only a reduction in conservatism applied to the subject parameter is being changed. Thus there will be no impact in margins of safety during steady-state operation.

FIGURE 3.1-1
ALLOWABLE MTC MODES 1 AND 2
PALO VERDE UNIT 2 CYCLE 1



NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3.3.3.7 Table 3.3-11

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety:

(B) The proposed amendment is a change that is necessary to eliminate spurious actuation of the smoke detectors in fire zones 74A and 74B.

Table 3.3-11 lists 6 as the number of instruments in fire zones 74A and B respectively at elevations 100', 120' and 140'. These smoke detectors actuate when steam passes through the detector chamber. By changing the smoke detector to heat detectors, steam clouds would not affect the system.

This will not change the function of the system as designed, the original purpose remains the same. The heat detectors will be an improvement over the performance of the smoke detectors, therefore, the safety of the plant will not be adversely affected.

TABLE 3.3-11 (Continued)

FIRE DETECTION INSTRUMENTS

FIRE ZONE	ELEVATION	INSTRUMENT LOCATION	TOTAL NUMBER OF INSTRUMENTS* HEAT (x/y)	FLAME (x/y)	SMOKE (x/y)
63A	120'	No. 1 RCPs and SG Area			6/0
63B	120'	No. 2 RCPs and SG Area			6/0
66A&66B 67A&67B	140'	Southwest, Southeast, Northwest and Northeast Perimeters	1/0		
63A	140'	No. 1 RCPs and SG Area			5/0
63B	140'	No. 2 RCPs and SG Area			5/0
70	140'	Refueling Pool and Canal Area			4/0
71A	140'	North Preaccess Normal AFU Area			2/0
71B	140	South Preaccess Normal AFU Area			2/0
		MAIN STEAM SUPPORT STRUCTURE			
72	80'	Turbine Driven Aux. Feedpump Rm.			0/3
73	80'	Motor Driven Aux. Feedpump Rm.			1/1
74A	100',120' & 140'	Main Steam Isol. & Dump Valve Area North	0/6		~~0/6~~
74B	100',120' & 140'	Main Steam Isol. & Dump Valve Area South	0/6		~~0/6~~
		OUTSIDE AREAS			
83		Condensate Storage Tank Pump House			2/0

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.5.1

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan.

This change will increase the minimum boron concentration in the Safety Injection Tank, and it will increase the amount of level change allowed prior to requiring a verification of boron concentration in the tank.

The increase in minimum boron concentration from 2,000 to 2,400 PPM will adequately compensate for the increased dilution effect which results from the increased level change allowed prior to sampling. In addition, the boron concentration will be verified at least every 31 days, as is presently required.

3/4.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3/4.5.1 SAFETY INJECTION TANKS

LIMITING CONDITION FOR OPERATION

3.5.1 Each Reactor Coolant System safety injection tank shall be OPERABLE with:

a. The isolation valve key-locked open and power to the valve removed,

b. A contained borated water level of between 1802 cubic feet (28% narrow range indication) and 1914 cubic feet (72 % narrow range indication),

c. A boron concentration between ~~2000~~ 2400 and 4400 ppm of boron, and

d. A nitrogen cover-pressure of between 600 and 625 psig.

e. Nitrogen vent valves closed and power removed**.

f. Nitrogen vent valves capable of being operated upon restoration of power.

APPLICABILITY: MODES 1*, 2*, 3,*†, and 4*†.

ACTION:

a. With one safety injection tank inoperable, except as a result of a closed isolation valve, restore the inoperable tank to OPERABLE status within 1 hour or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

b. With one safety injection tank inoperable due to the isolation valve being closed, either immediately open the isolation valve or be in at least HOT STANDBY within 1 hour and be in HOT SHUTDOWN within the next 12 hours.

SURVEILLANCE REQUIREMENTS

4.5.1 Each safety injection tank shall be demonstrated OPERABLE:

a. At least once per 12 hours by:

1. Verifying the contained borated water volume and nitrogen cover-pressure in the tanks is within the above limits, and

---

†With pressurizer pressure greater than or equal to 1837 psia. When pressurizer pressure is less than 1837 psia, at least three safety injection tanks must be OPERABLE, each with a minimum pressure of 254 psig and a maximum pressure of 625 psig, and a contained borated water volume of between 1415 cubic feet (60% wide range indication) and 1914 cubic feet (83% wide range indication). With all four safety injection tanks OPERABLE, each tank shall have a minimum pressure of 254 psig and a maximum pressure of 625 psig, and a contained borated water volume of between 962 cubic feet (39% wide range indication) and 1914 cubic feet (83% wide range indication). In MODE 4 with pressurizer pressure less than 430 psia, the safety injection tanks may be isolated.

*See Special Test Exceptions 3.10.6 and 3.10.8.

**Nitrogen vent valves may be cycled as necessary to maintain the required nitrogen cover pressure per Specification 3.5.1d.

SURVEILLANCE REQUIREMENTS (Continued)

2. Verifying that each safety injection tank isolation valve is open and the nitrogen vent valves are closed.

b. At least once per 31 days and within 6 hours after each solution level increase of greater than or equal to 7% of tank narrow range level by verifying the boron concentration of the safety injection tank solution is between 2000 and 4400 ppm.

REPLACE WITH INSERT A

c. At least once per 31 days when the RCS pressure is above 700 psig, by verifying that power to the isolation valve operator is removed.

d. At least once per 18 months by verifying that each safety injection tank isolation valve opens automatically under each of the following conditions:

1. When an actual or simulated RCS pressure signal exceeds 515 psia, and

2. Upon receipt of a safety injection actuation (SIAS) test signal.

e. At least once per 18 months by verifying OPERABILITY of RCS-SIT differential pressure alarm by simulating RCS pressure > 715 psia with SIT pressure < 600 psig.

f. At least once per 18 months, when SITs are isolated, by verifying the SIT nitrogen vent valves can be opened.

g. At least once per 31 days, by verifying that power is removed from the nitrogen vent valves.

INSERT A

AT LEAST ONCE PER 31 DAYS AND WHENEVER THE TANK IS DRAINED TO MAINTAIN THE CONTAINED BORATED WATER LEVEL WITHIN THE LIMITS OF SPECIFICATION 3.5.1.b BY VERIFYING THE BORON CONCENTRATION OF THE SAFETY INJECTION TANK SOLUTION IS BETWEEN 2400 AND 4400 PPM.

3/4.5.1 SAFETY INJECTION TANKS

The OPERABILITY of each of the Safety Injection System (SIS) safety injection tanks ensures that a sufficient volume of borated water will be immediately forced into the reactor core through each of the cold legs in the event the RCS pressure falls below the pressure of the safety injection tanks. This initial surge of water into the RCS provides the initial cooling mechanism during large RCS pipe ruptures.

The limits on safety injection tank volume, boron concentration, and pressure ensure that the safety injection tanks will adequately perform their function in the event of a LOCA in MODE 1, 2, 3, or 4.

A minimum of 25% narrow range corresponding to 1790 cubic feet and a maximum of 75% narrow range corresponding to 1927 cubic feet of borated water are used in the safety analysis as the volume in the SITs. To allow for instrument accuracy, 28% narrow range corresponding to 1802 cubic feet and 72% narrow range corresponding to 1914 cubic feet, are specified in the Technical Specification.

A minimum of 593 psig and a maximum pressure of 632 psig are used in the safety analysis. To allow for instrument accuracy 600 psig minimum and 625 psig maximum are specified in the Technical Specification.

A boron concentration of 2000 ppm minimum and 4400 ppm maximum are used in the safety analysis. ADD INSERT B

The SIT isolation valves are not single failure proof; therefore, whenever the valves are open power shall be removed from these valves and the switch keylocked open. These precautions ensure that the SITs are available during a Limiting Fault.

The SIT nitrogen vent valves are not single failure proof against depressurizing the SITs by spurious opening. Therefore, power to the valves is removed while they are closed to ensure the safety analysis assumption of four pressurized SITs.

All of the SIT nitrogen vent valves are required to be operable so that, given a single failure, all four SITs may still be vented during post-LOCA long-term cooling. Venting the SITs provides for SIT depressurization capability which ensures the timely establishment of shutdown cooling entry conditions as assumed by the safety analysis for small break LOCAs.

The limits for operation with a safety injection tank inoperable for any reason except an isolation valve closed minimizes the time exposure of the plant to a LOCA event occurring concurrent with failure of an additional safety injection tank which may result in unacceptable peak cladding temperatures. If a closed isolation valve cannot be immediately opened, the full capability of one safety injection tank is not available and prompt action is required to place the reactor in a MODE where this capability is not required.

For MODES 3 and 4 operation with pressurizer pressure less than 1837 psia the Technical Specifications require a minimum of 57% wide range corresponding

INSERT B

THE TECHNICAL SPECIFICATION LOWER LIMIT OF 2400 PPM IN THE SIT ASSURES THAT THE BACKLEAKAGE FROM RCS WILL NOT DILUTE THE SITs BELOW THE 2000 PPM LIMIT ASSUMED IN THE SAFETY ANALYSIS PRIOR TO THE TIME WHEN DRAINING OF THE SIT IS NECESSARY.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.6.4.1

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan.

The installed containment hydrogen monitoring system is augmented by the hydrogen sampling capability of the Post Accident Sampling System (PASS). This system, which meets the requirements of NUREG 0737, section II.B3., uses the same containment penetration as one of the installed hydrogen monitors. The system has redundant sample pumps which deliver the sample to the chemistry lab. The sample is then analyzed using a laboratory grade gas chromatograph. Surveillance is performed on the sampling capability per specification 4.3.3.1 and the gas chromatograph is calibrated prior to each use and is analytically verified every 18 months.

This system provides a reliable and accurate backup to the installed hydrogen monitors.

CONTAINMENT SYSTEMS

3/4.6.4 COMBUSTIBLE GAS CONTROL

HYDROGEN MONITORS

LIMITING CONDITION FOR OPERATION

3.6.4.1 Two independent containment hydrogen monitors shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTION:

a. With one hydrogen monitor inoperable, restore the inoperable monitor to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours.

b. With both hydrogen monitors inoperable; restore at least one monitor to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours.

C. INSERT A

SURVEILLANCE REQUIREMENTS

4.6.4.1 Each hydrogen monitor shall be demonstrated OPERABLE by the performance of a CHANNEL CHECK at least once per 12 hours, a CHANNEL FUNCTIONAL TEST at least once per 31 days, and at least once per 92 days on a STAGGERED TEST BASIS by performing a CHANNEL CALIBRATION using sample gases containing a nominal:

a. One volume percent hydrogen, balance nitrogen.

b. Four volume percent hydrogen, balance nitrogen.

INSERT A.

WITH ONE HYDROGEN MONITOR INOPERABLE, THE PROVISIONS OF SPECIFICATION 3.0.4 ARE NOT APPLICABLE IF THE HYDROGEN SAMPLING AND ANALYTICAL CAPABILITIES OF THE POST ACCIDENT SAMPLING SYSTEM ARE OPERABLE.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.6.4.1

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan.

The installed containment hydrogen monitoring system is augmented by the hydrogen sampling capability of the Post Accident Sampling System (PASS). This system, which meets the requirements of NUREG 0737, section II.B.3., uses the same containment penetration as one of the installed hydrogen monitors. The system has redundant sample pumps which deliver the sample to the chemistry lab. The sample is then analyzed using a laboratory grade gas chromatograph. Surveillance is performed on the sampling capability per specification 4.3.3.1 and the gas chromatograph is calibrated prior to each use and is analytically verified every 18 months.

This system provides a reliable and accurate backup to the installed hydrogen monitors.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment automatic isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment and is consistent with the requirements of GDC 54 through GDC 57 of Appendix A to 10 CFR Part 50. Containment isolation within the time limits specified for those isolation valves designed to close automatically ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

The only valves in the Table 6.2.4-1 of the PVNGS FSAR that are not required to be listed in Table 3.6-1 are the following: main steam safety valves and main steam atmospheric dump valves. The main steam safety valves and the atmospheric dump valves have very high pressure setpoints to actuate and are covered by Specifications 3/4.7.1.1 and 3/4.7.1.6, respectively.

3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit (or the purge system) is capable of controlling the expected hydrogen generation associated with (1) zirconium-water reactions, (2) radiolytic decomposition of water and (3) corrosion of metals within containment. These hydrogen control systems are consistent with the recommendations of Regulatory Guide 1.7, "Control of Combustible Gas Concentrations in Containment Following a LOCA," March 1971.

THE INSTALLED CONTAINMENT HYDROGEN MONITORING SYSTEM IS AUGMENTED BY THE HYDROGEN SAMPLING CAPABILITY OF THE POST ACCIDENT SAMPLING SYSTEM (PASS). THIS SYSTEM USES THE SAME CONTAINMENT PENETRATION AS ONE OF THE INSTALLED HYDROGEN MONITORS. THE SAMPLE IS DRAWN FROM THE CONTAINMENT AND IS PUMPED TO THE CHEMISTRY LAB BY ONE OF TWO REDUNDANT SAMPLE PUMPS. THE SAMPLE IS THEN ANALYZED USING A GAS CHROMATOGRAPH.

SPECIFICATION 4.3.3.1 REQUIRES MONTHLY SURVEILLANCE TESTS BE PERFORMED ON THE PASS.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.7.1.1

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety; and

(B) The proposed amendment is the deletion of MODE 3 in action statement a. which reflects the fact that the reactor is subcritical in Mode 3 and the overpower protection at this time is provided by the High Logarithmic Power level trip at .798% power. The change from 4 hours to accomplish prescribed action a. provides a realistic time period in which to accomplish this action in a safe controlled manner.

T.S. 3/4.7.1.1

Changing the Variable Overpower Trip setpoints is the fastest method to accomplish the compensatory actions. There are four channels which must be readjusted; each channel requires approximately 2 hours to readjust. In addition, some amount of time must be allowed for the technicians to refamiliarize themselves with the procedure, time to process work control paperwork, and time to close out the job and declare the system OPERABLE. The logic required for the Variable Overpower Trip is 2 out of 4; at least two channels would be readjusted in approximately the present 4 hour limit. These two channels would be OPERABLE and capable of performing their trip function at the lower setpoint.

Stating that <u>at least</u> one reactor coolant loop and associated steam generator should be in operation will eliminate confusion which required a phone conversation on January 10, 1986 between Messrs, Knighton, Crutchfield and Viagitio of the NRC staff and members of the ANPP staff.

3/4.7 PLANT SYSTEMS

3/4.7.1 TURBINE CYCLE

SAFETY VALVES

LIMITING CONDITION FOR OPERATION

3.7.1.1 All main steam safety valves shall be OPERABLE with lift settings as specified in Table 3.7-1.

APPLICABILITY: MODES 1, 2, 3, and 4*.

ACTION:

a. With both reactor coolant loops and associated steam generators in operation and with one or more** main steam safety valves inoperable per steam generator, operation in MODES ~~1, 2, and 3~~ 1 AND 2 may proceed provided that within ~~4~~ 12 hours, either all the inoperable valves are restored to OPERABLE status or the Maximum Variable Overpower trip setpoint and the Maximum Allowable Steady State Power Level are reduced per Table 3.7-2; otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. Operation in MODES 3 and 4* may proceed with AT LEAST one reactor coolant loop and associated steam generator in operation, provided that there are no more than four inoperable main steam safety valves associated with the operating steam generator; otherwise, be in COLD SHUTDOWN within the following 30 hours.

c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.1.1 No additional Surveillance Requirements other than those required by Specification 4.0.5.

*Until the steam generators are no longer required for heat removal.

**The maximum number of inoperable safety valves on any operating steam generator is four (4).

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.8.1.1

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a change that will allow surveillance testing of diesel generators from an additional location.

Section 4.8.1.1.2a.4.: Regulatory Guide 1.108 Rev. 1, to which APS is committed per section 1.8 of the FSAR, states that "all diesel generator protective trips should be in force during diesel generator unit testing. Re-stating this in the specification as a requirement is an unnecessary regulation. APS does not intend to start the diesel generator in the emergency mode for testing purposes except to prove that a diesel generator could perform its emergency functon in the event of a test start failure. The diesel generator would not have to be unnecessarily declared inoperable while the test start circuit was being repaired.

4.8.1.1.2a.4.a): The diesel generator may also be started manually from the local control panel. The start circuit from the local control panel is in parallel with and duplicates the start circuit from the control room. This change will allow a local start as well as a start from the control room to count as a valid test of the diesel generator.

4.8.1.1.1 Each of the above required physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:

a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignment indicating power availability

b. Demonstrated OPERABLE at least once per 18 months during shutdown by manually transferring the onsite Class 1E power supply from the normal circuit to the alternate circuit.

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE:

a. In accordance with the frequency specified in Table 4.8-1 on a STAGGERED TEST BASIS by:

1. Verifying the fuel level in the day tank.

2. Verifying the fuel level in the fuel storage tank.

3. Verifying the fuel transfer pump can be started and transfers fuel from the storage system to the day tank.

4. Verifying the diesel generator can start** and accelerate to generator voltage and frequency at 4160 ± 420 volts and 60 ± 1.2 Hz in less than or equal to 10 seconds. Subsequently, the generator shall be manually synchronized to its appropriate bus and gradually loaded** to an indicated 5200-5400 kW*** and operates for at least 60 minutes. The diesel generator shall be started for this test ~~with all diesel generator protective trips in force****~~ and using one of the following signals on a STAGGERED TEST BASIS:

a) Manual ~~from control room~~.
b) Simulated loss of offsite power by itself.
c) Simulated loss of offsite power in conjunction with an ESF actuation test signal.
d) An ESF actuation test signal by itself.

5. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.

**This test shall be conducted in accordance with the manufacturer's recommendations regarding engine prelube and warmup procedures, and as applicable regarding loading recommendations.

***This band is meant as guidance to avoid routine overloading of the engine. Loads in excess of this band for special testing under direct monitoring of the manufacturer or momentary variations due to changing bus loads shall not invalidate the test.

****Until the first refueling outage, the diesel generator shall be test started only manually, ~~from the control room, in order that the EDG protective features are not bypassed during testing~~.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.2.5

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan.

Basis For Change To Technical Specification 3/4.2.5

PNVGS Unit 1 Technical Specification 3/4.2.5 (RCS Flowrate) required a minimum actual flowrate of 164.0×10^6 lbm/hr. Flowrate was measured during post-core hot functional testing with an ultrasonic flow meter (UFM). The measured flowrate at zero power was 105.1% of the design flowrate. This value must be adjusted by two factors before it can be compared with the technical specification flow requirement.

The first factor accounts for the fact that the primary coolant specific volume on the core exit side is higher during the full power operation than it is at zero power. The currently projected value associated with the resulting flowrate reduction is 1.4%. Thus, the projected full power flowrate is 103.7%.

The second factor accounts for the uncertainty associated with the flow measurement. The attached figure shows the flowrate measurement uncertainty associated with the mass flowrate indicated by COLSS, designated as NKTMFLOW. The variation in the flow measurement uncertainty with time is the result of drift and radiation effects on the pump differential pressure transducer output. As can be seen from the attached figure, the uncertainty associated with 4 months of operation is 3.4%. Using this value for illustration purposes, the projected full power flowrate adjusted for measurement uncertainty is 100.3%.

The previously mentioned technical specification as presently written is unclear as to the meaning of actual flowrate which is to be compared to 164×10^6 lbm/hr (100% design flow). Comparing indicated flowrate to 100% is bounded by the safety analysis. C-E's original interpretation of this technical specification however required subtraction of the flowrate measurement uncertainty from the indicated flowrate before comparison with the 100% value.

Using a projected indicated full power flowrate of 103.7% and an uncertainty of 3.4%, this comparison results in a +0.3% "operational flowrate margin" at 4 months from initial calibration of the pump differential pressure transducers. At the end of cycle 1 the operational flowrate margin for PVNGS Unit 1 could be near zero.

The operational flowrate margin may also be diminished by other factors. These are listed below.

1. Core crudding: 1 psi of core crudding causes a flowrate reduction of 0.35%.

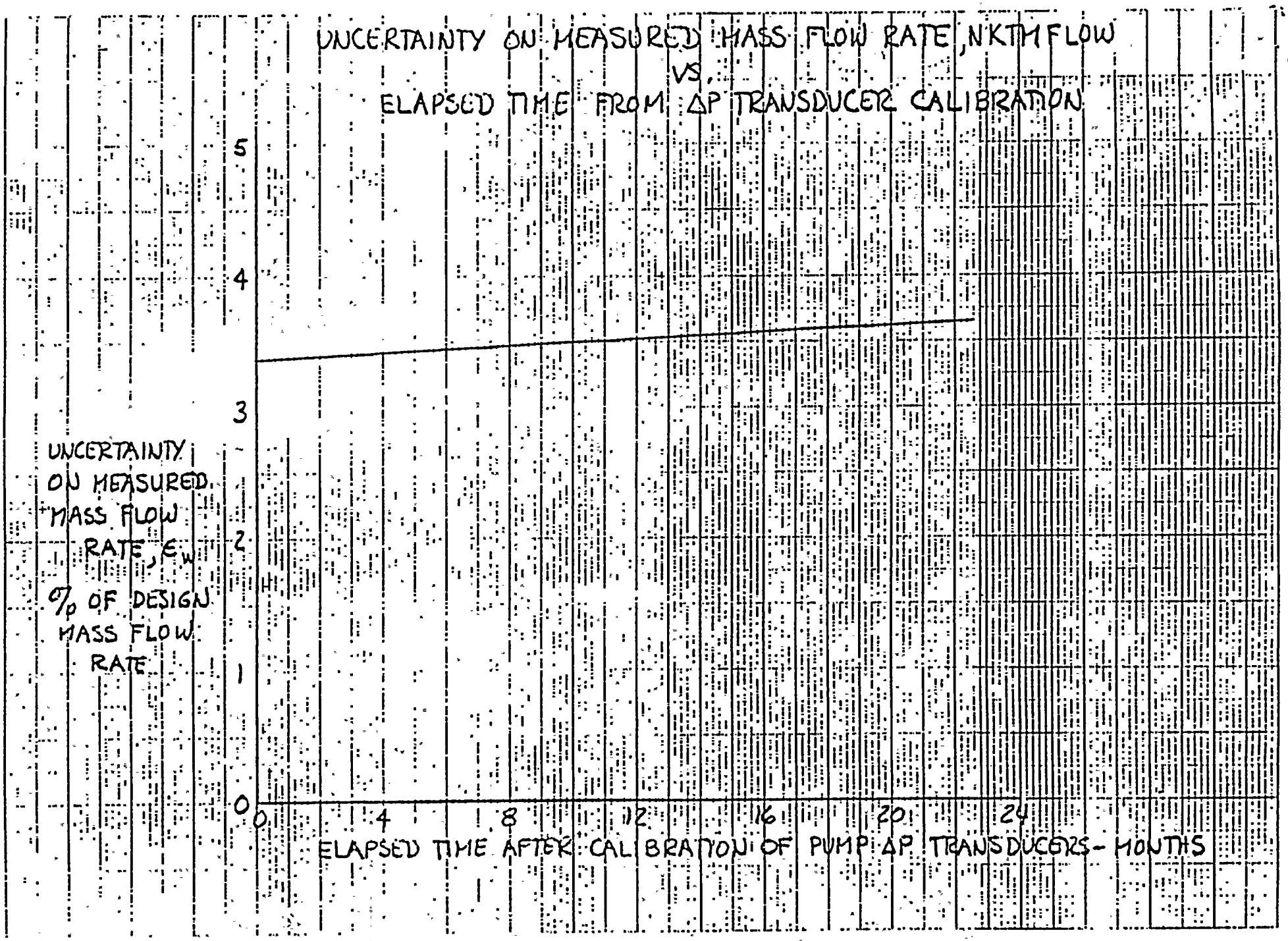
2. Tube plugging: Plugging 100 short steam generator tubes causes an estimated flowrate reduction of 0.18%.

3. Random effects associated with each flow measurement can influence a given measurement in the positive or negative direction.

According to the corresponding basis section, the flowrate requirement is provided to ensure that the safety analysis assumptions are maintained. In the safety analyses, the effects of flowrate are evaluated over a range of 95-116%. Where flowrate impacted [illegible] analysis results, the most adverse flowrate was used. Where flowrate did not significantly affect analysis results a nominal value of 100% (164×10^6 lbm/hr) was used in conjunction with a sensitivity analysis.

Thus, the safety analysis assumptions are preserved by a flow rate of 155.8×10^6 lbm/hr (95% of 164×10^6 lbm/hr).

Since the operational flowrate margin is small, we are requesting that the specified value for RCS flowrate be changed to the 95% value.


UNCERTAINTY ON MEASURED MASS FLOW RATE, NKTM FLOW
VS.
ELAPSED TIME FROM ΔP TRANSDUCER CALIBRATION
UNCERTAINTY ON MEASURED MASS FLOW RATE, ϵ_w % OF DESIGN MASS FLOW RATE
0
1
2
3
4
5
0
4
8
12
16
20
24
ELAPSED TIME AFTER CALIBRATION OF PUMP ΔP TRANSDUCERS - MONTHS

POWER DISTRIBUTION LIMITS

3/4.2.5 RCS FLOW RATE

LIMITING CONDITION FOR OPERATION

3.2.5 The actual Reactor Coolant System total flow rate shall be greater than or equal to ~~164.0~~ 155.8 x 10^6 lbm/hr.

APPLICABILITY: MODE 1.

ACTION:

With the actual Reactor Coolant System total flow rate determined to be less than the above limit, reduce THERMAL POWER to less than 5% of RATED THERMAL POWER within the next 4 hours.

SURVEILLANCE REQUIREMENTS

4.2.5 The actual Reactor Coolant System total flow rate shall be determined to be greater than or equal to its limit at least once per 12 hours.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3.6.4.2

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is an exception to a technical specification justified by existing limiting conditions for operation and action statements.

The present specification allows unlimited operation in MODES 1 and 2 with one H_2 recombiner inoperable as long as the H_2 purge system is OPERABLE per specification 3.6.4.3; therefore, an exception to 3.0.4 may be granted with no further risk to the public.

CONTAINMENT SYSTEMS

ELECTRIC HYDROGEN RECOMBINERS

LIMITING CONDITION FOR OPERATION

3.6.4.2 Two portable independent containment hydrogen recombiner systems shared among the three units shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTION:

a. With one hydrogen recombiner system inoperable, restore the inoperable system to OPERABLE status within 30 days or meet the requirements of Specification 3.6.4.3, or be in at least HOT STANDBY within the next 6 hours.

b. WITH ONE HYDROGEN RECOMBINER SYSTEM INOPERABLE, AND THE HYDROGEN PURGE SYSTEM OPERABLE PER SPECIFICATION 3.6.4.3; THE PROVISIONS OF SPECIFICATION 3.0.4 ARE NOT APPLICABLE

SURVEILLANCE REQUIREMENTS

4.6.4.2 Each hydrogen recombiner system shall be demonstrated OPERABLE:

a. At least once per 6 months by:

1. Verifying through a visual examination that there is no evidence of abnormal conditions within the recombiner enclosure and control console.

2. Operating the air blast heat exchanger fan motor and enclosed blower motor continuously for at least 30 minutes.

b. At least once per year by:

1. Performing a CHANNEL CALIBRATION of recombiner instrumentation.

2. Performing a "Low-Level Test-Heater Power Off" and "Low-Level Test-Heater Power On" test and verifying that the recombiner temperature increases to and is maintained at 600 ± 25°F for at least one hour. With power off and a simulated input signal of 1280°F, verify the OPERABILITY of all control circuits. When this test is conducted, the air blast heat exchanger fan motor and enclosed blower motor shall be operated continuously for at least 30 minutes.

c. At least once per 5 years by performing a Recombiner System "High-Level Test" and verifying that the recombiner temperature increases to and is maintained at 1200 ± 50°F for at least one hour.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.4.8.3

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan.

This change will allow a plant heatup of 10°F/hour above 255°F with the low temperature overpressure protection out of service.

Re-examination of the pressure/temperature analysis shows that the isothermal to 100°F/hour cooldown curve (Fig. 3. 4-2) also encompasses the 10°F/hour heatup rate.

The curve intersects 255°F at the 2500 psia point. Therefore, a heat up rate of 10°F/hour or less may be tolerated as low as 255°F with the low pressure overpressure protection out of service.

Since this change is within the present analysis for pressure/temperature relationship, there is no increase in risk to the public.

This change should be reviewed concurrently with the change to specification 3/4.4.8.1.

REACTOR COOLANT SYSTEM

OVERPRESSURE PROTECTION SYSTEMS

LIMITING CONDITION FOR OPERATION

3.4.8.3 Both shutdown cooling system (SCS) suction line relief valves with lift settings of less than or equal to 467 psig shall be OPERABLE and aligned to provide overpressure protection for the Reactor Coolant System.

APPLICABILITY: When the reactor vessel head is installed and the temperature of one or more of the RCS cold legs is less than or equal to:

a. 255°F during cooldown
b. 295°F* during heatup

ACTION:

a. With one SCS relief valve inoperable, restore the inoperable valve to OPERABLE status within seven days or reduce T_{cold} to less than 200°F and, depressurize and vent the RCS through a greater than or equal to 16 square inch vent(s) within the next eight hours. Do not start a reactor coolant pump if the steam generator secondary water temperature is greater than 100°F above any RCS cold leg temperature.

b. With both SCS relief valves inoperable, reduce T_{cold} to less than 200°F and, depressurize and vent the RCS through a greater than or equal to 16 square inch vent(s) within eight hours. Do not start a reactor coolant pump if the steam generator secondary water temperature is greater than 100°F above any RCS cold leg temperature.

c. In the event either the SCS suction line relief valves or an RCS vent(s) are used to mitigate an RCS pressure transient, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 30 days. The report shall describe the circumstances initiating the transient, the effect of the SCS suction line relief valves or RCS vent(s) on the transient and any corrective action necessary to prevent recurrence.

d. The provisions of Specification 3.0.4. are not applicable.

SURVEILLANCE REQUIREMENTS

4.4.8.3.1 Each SCS suction line relief valve shall be verified to be aligned to provide overpressure protection for the RCS once every 8 hours during

a. Cooldown with the RCS temperature less than or equal to 255°F.
b. Heatup with the RCS temperature less than or equal to 295°F.

4.4.8.3.2 The SCS suction line relief valves shall be verified OPERABLE with the required setpoint at least once per 18 months.

* (SEE ATTACHED PAGE FOR FOOTNOTE)

* 255°F during heatup provided the heatup rate is limited to 10°F/hr or less for RCS temperature greater than 255°F and less than or equal to 295°F.

NO SIGNIFICANT HAZARDS CONSIDERATION DOCUMENTATION

Unit 2 Technical Specification 3/4.4.8.1

The proposed amendment request does not involve a Significant Hazards Consideration because:

(A) The operation of PVNGS Unit 2 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 analyzed; or

3) Involve a significant reduction in a margin of safety;

(B) The proposed amendment is a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan.

This change is made in conjunction with the change to specification 3/4.4.8.3. Re-examination of the pressure/temperature analysis shows that the isothermal to 100°F hr. cooldown curve (Fig. 3.4-2) also encompasses the 10°F/hour heat up rate.

This change will allow the change to be made to specification 3/4.4.8.3 and both changes should be reviewed concurrently.

FIGURE 3.4-2
RCS PRESS/TEMP LIMITS
0-10 YRS

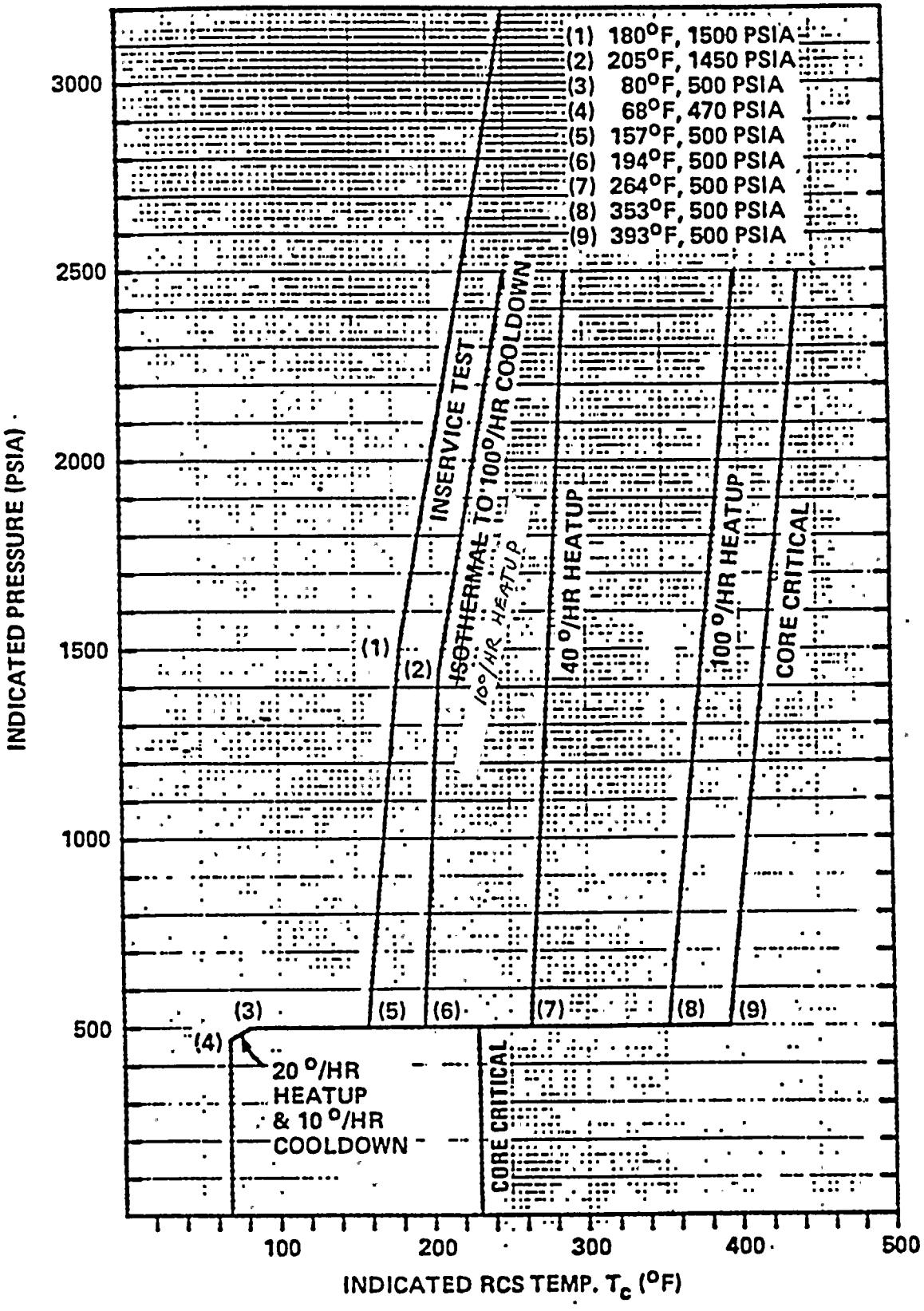


FIGURE 3.4-2

RCS PRESS/TEMP LIMITS (0 - 10 YRS) FULL POWER OPERATION