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ACCESSION NBR: 8605200277 DDC. DATE: 86/05/14 NOTARIZED: YES DOCKET # FACIL: STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528 AUTH. NAME AUTHOR AFFILIATION VAN BRUNT, E. E. Arizona Nuclear Power Project (formerly Arizona Public Serv RECIP. NAME RECIPIENT AFFILIATION KNIGHTON, G. W. PWR Project Directorate 7

SUBJECT: Application for amend to License NPF-41, changing Tech Spec Section 3/4.8.1 "AC Sources" & Table 4.8.1 re diesel generator test schedule, per Generic Ltr 84-15: Fee paid.

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NOTES: Standardized plant.

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Arizona Nuclear Power Project P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

> May 14, 1986 ANPP-36587-EEVB/JRP/98.05

Director of Nuclear Reactor Regulation Attention: Mr. G. W. Knighton, Project Director PWR Project Directorate #7 Division of Pressurized Water Reactor Licensing - B U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Subject: Palo Verde Nuclear Generating Station (PVNGS) Unit 1 Docket No. STN 50-528 (License NPF-41) Technical Specification Amendment - A. C. Sources File: 86-005-419.05; 86-056-026

Dear Mr. Knighton:

Attached, please find proposed changes to the PVNGS Unit 1 Technical Specifications Section 3/4.8.1 "A.C. Sources". The changes presented herewith were previously discussed with and agreed to by your staff during the PVNGS Unit 2 Technical Specification review process and have been incorporated into the PVNGS Unit 2 license.

By this letter, we are requesting that the attached changes be incorporated into the Unit 1 Technical Specifications. Attachment 1 to this letter is the no significant hazards consideration for your review and approval. Attachment 2 is Technical Specification 3/4.8.1 which is to be replaced by Attachment 3, the new section 3/4.8.1.

In future correspondence, we will be requesting additional changes to the Unit 1 Technical Specifications in order for the Technical Specifications to be identical with Unit 2.

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

If you have any questions, please call.

Very trul yours, E. E. Van Brunt, Jr.

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

EEVB/JRP/rw Attachments

cc: Director, Region V, USNRC NRC Project Director, E. A. Licitra NRC Resident Inspector, R. P. Zimmerman

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ATTACHMENT 1

DESCRIPTION OF AMENDMENT REQUEST:

The proposed amendment would modify Technical Specification 8.1, "A.C. Sources"; Table 4.8-1, Diesel Generator Test Schedule; and associated pages within this section.

The proposal contains general reductions in the testing requirements for the onsite emergency diesel generators (EDG's) in the plant Technical Specifications. These changes involve both routine surveillance testing and special testing and would reduce the severity of each EDG test start and reduce the number of test starts. These changes follow the directions of existing regulatory guidance (RG 1.108) and are consistent with the guidance in Generic Letter 84-15.

BASIS FOR NO SIGNIFICANT HAZARDS DETERMINATION:

The proposed changes do not involve a significant hazards consideration because operation of Palo Verde Nuclear Generating Station Unit 1 in accordance with this change would not:

(1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes include that the EDG tests be conducted with loading rates recommended by the EDG manufacturer, and at a lower indicated full-load value. The primary basis for this action is that, in addition to the belief that cold fast test starts are generally detrimental, significant engine failures have occurred at various facilities and testing requirements may have aggravated the cause of these failures.

Therefore, this proposed change would not increase the probability or consequences of an accident.

(2) Create the possibility of a new or different kind of accident from any previously analyzed.

It has been determined that a new or different kind of accident will not be possible due to this change. By eliminating unnecessary diesel generator testing, it is expected that the overall reliability of the EDGs will be improved.

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ATTACHMENT 1 (Continued)

(3) Involve a significant reduction in a margin of safety.

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Based on industry data it can be concluded that there will be no reduction in the margin of safety because of the increased reliability of the EDG's and that this increase in reliability is an adequate basis for reducing the testing requirements.

(B) The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists.

> The proposed change is similar to example (VII), a change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations.

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