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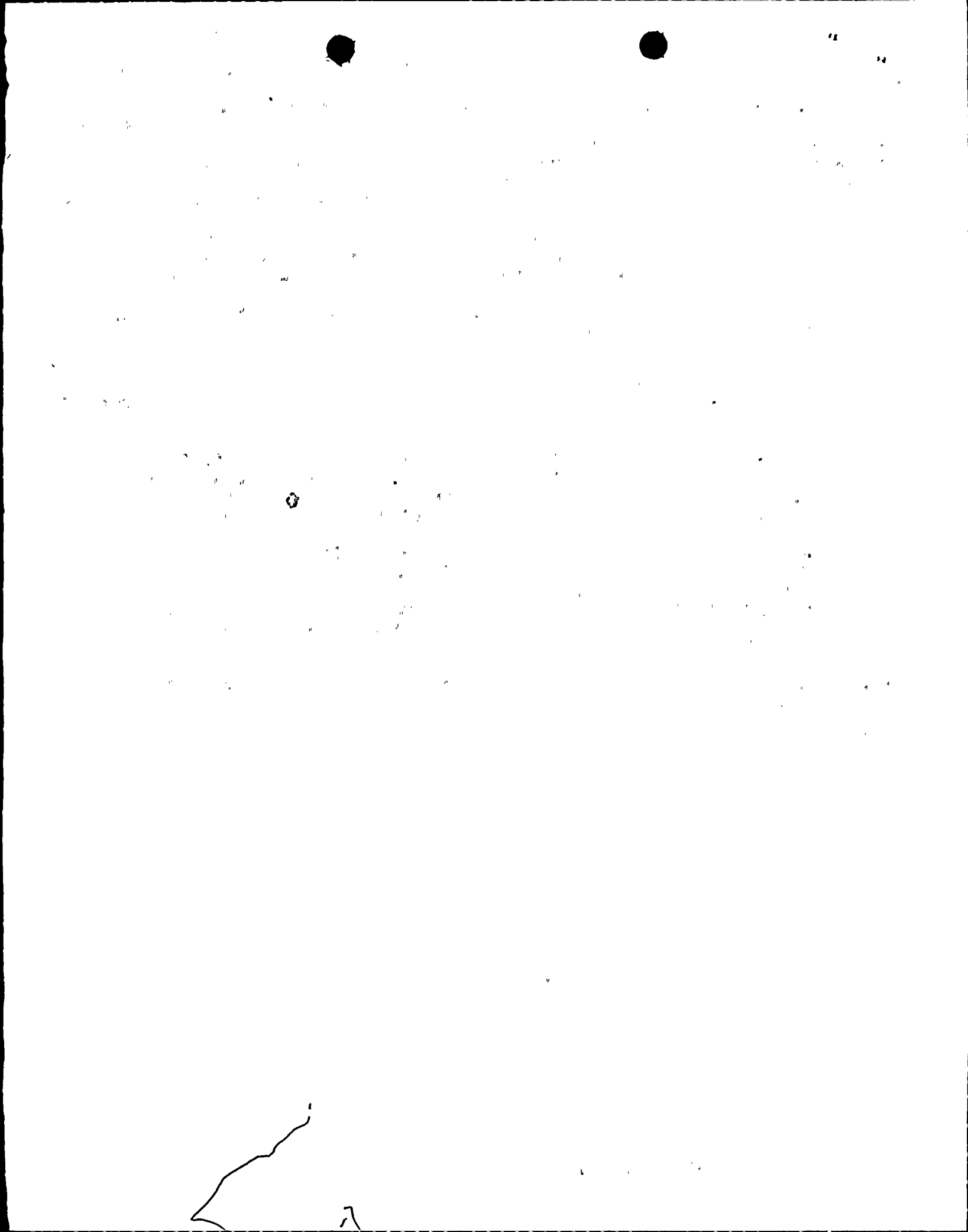
SUBJECT: Application for amends to Licenses NPF-41, NPF-51 & NPF-74  
 revising Tech Spec Section 6.9.1.4 to require repts to be  
 submitted within first calendar quarter of each yr. Fee paid.

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## Arizona Nuclear Power Project

P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

161-00712-EEVB/PGN  
December 22, 1987

Docket Nos. STN 50-528/529/530

U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

ATTN: Document Control Desk

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2 and 3  
Technical Specification Amendment -  
Section 6.9.1.4  
File: 87-F-005-419.05; 87-A-056-026

Attached please find proposed changes to the PVNGS Units 1, 2 and 3 Technical Specifications. The proposed change is to the due date requirement for the annual reports required by T.S. 6.9.1.4.

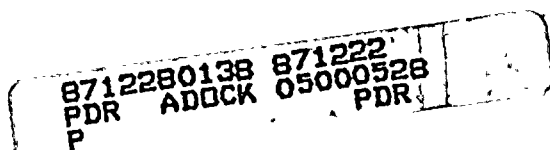
Enclosed with the amendment request package, are the following:

- A. Description of the Technical Specification Amendment Request.
- B. Purpose of the Technical Specification.
- C. Need for the Technical Specification Amendment.
- D. Basis for Proposed No Significant Hazards Consideration Determination.
- E. Safety Evaluation for the Amendment Request.
- F. Environmental Impact Consideration Determination.
- G. Marked-up Technical Specification Change Pages.

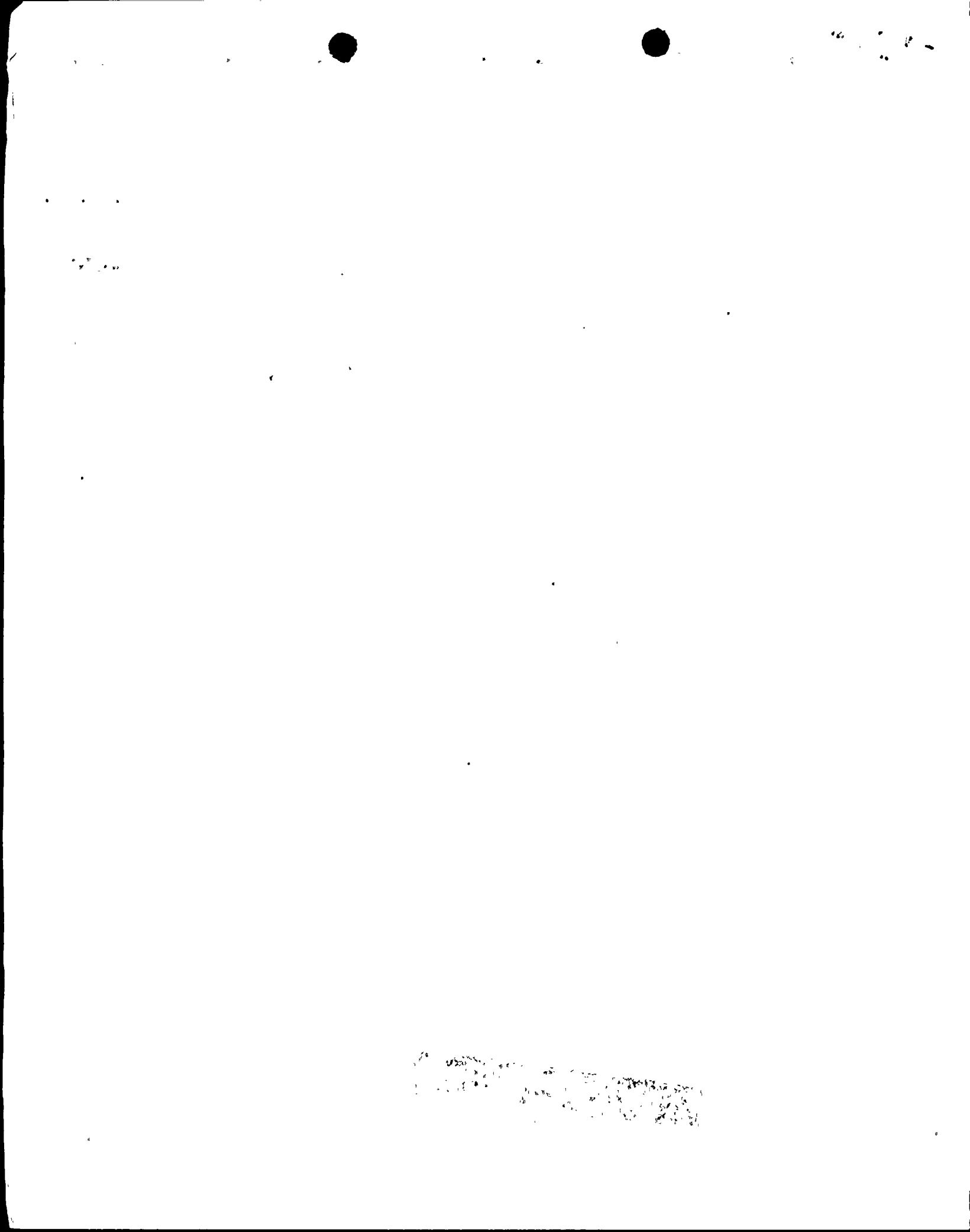
Once issued, the Technical Specification amendment will be implemented within thirty days of the effective date.

By copy of this letter, we are also forwarding the proposed changes to the appropriate state agency.

In accordance with the requirements of 10CFR170.12(c), the license amendment application fee of \$150.00 is being forwarded to the USNRC License Fee Management Coordinator.

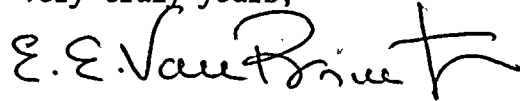


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If you have any questions, please call A. C. Rogers at (602) 371-4087.

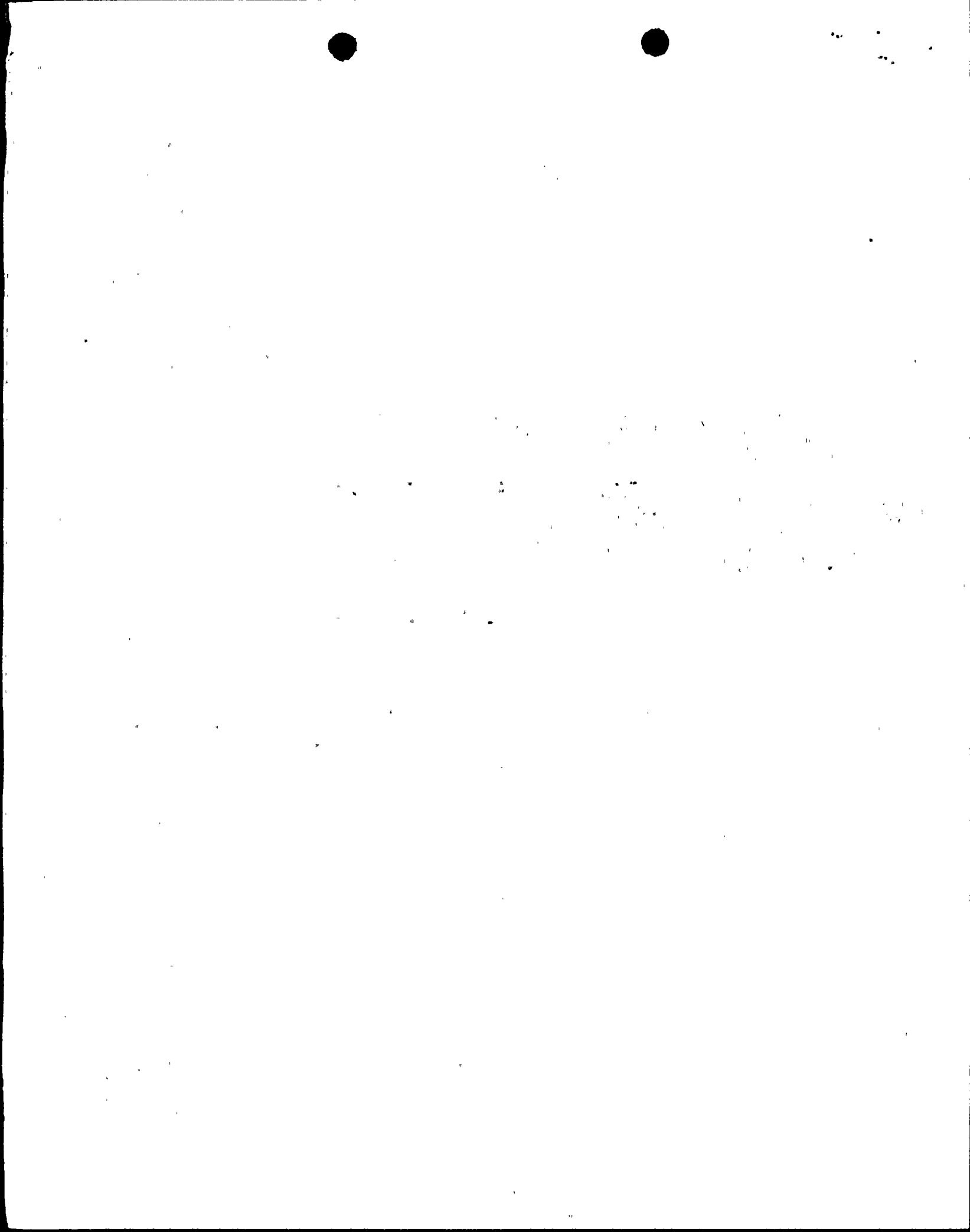
Very truly yours,



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

EEVB/PGN/l  
Attachments

cc: O. M. De Michele (all w/a)  
A. C. Gehr  
G. W. Knighton  
E. A. Licitra  
J. B. Martin  
J. R. Ball  
C. E. Tedford  
R. M. Diggs (w/WFD \$150.00)



ATTACHMENT

A. DESCRIPTION OF THE TECHNICAL SPECIFICATION AMENDMENT REQUEST

Technical Specification (T.S.) 6.9.1.4 currently requires that the annual reports described in T.S. 6.9.1.5 be submitted prior to March 1 of each year. The proposed change would modify this to require the reports to be submitted within the first calendar quarter of each year.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

The purpose of this Technical Specification is to delineate the due date for the annual reports described in T.S. 6.9.1.5.

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

This Technical Specification amendment is necessary to make the T.S. requirements consistent with the requirements of 10CFR20.407 and eliminate the potential for reports to be sent in late due to an inconsistency in the reporting requirements.

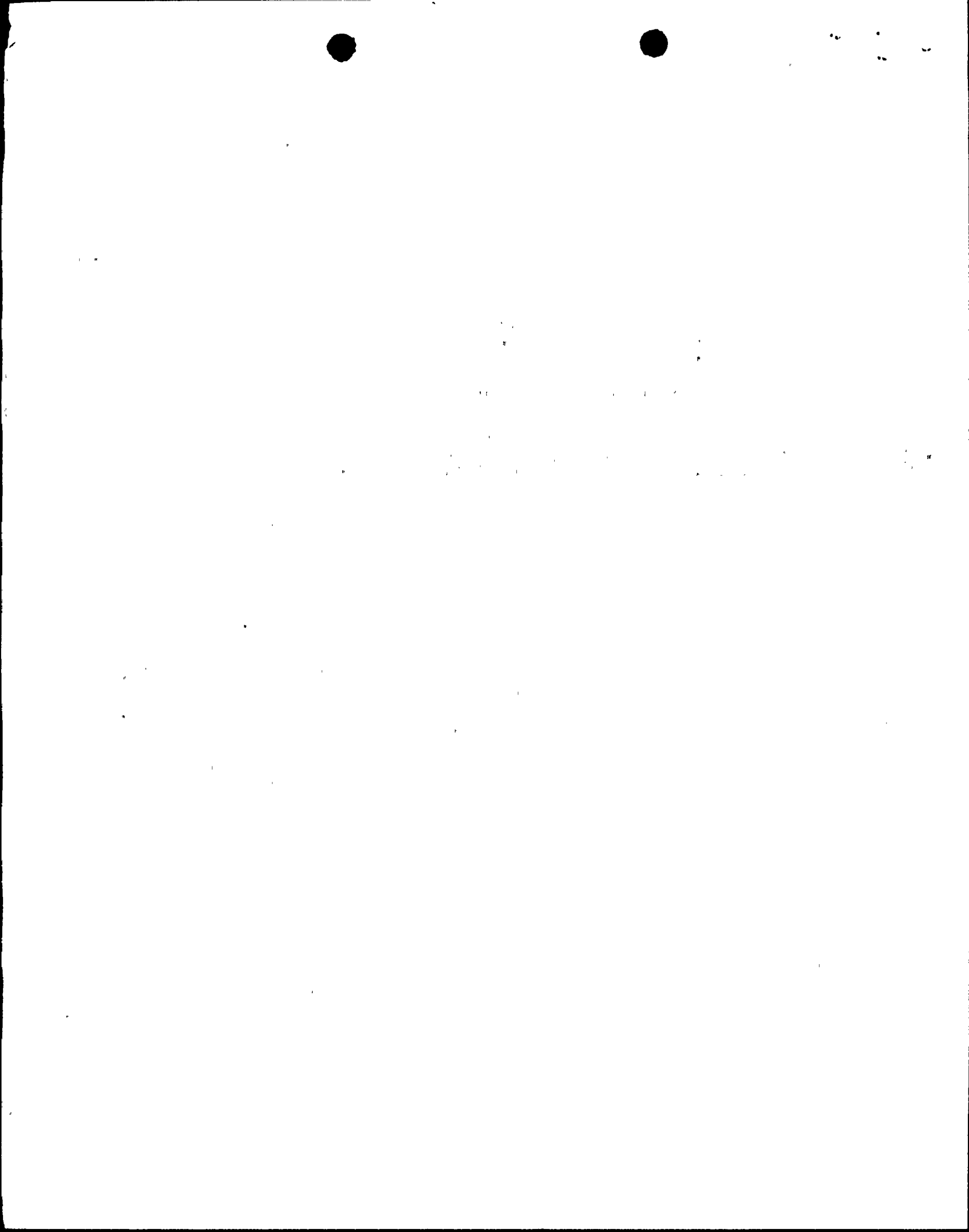
D. BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

1. The Commission has provided standards for determining whether a significant hazards consideration exists as stated in 10CFR50.92. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with a proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

A discussion of these standards as they relate to the amendment request follows:

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

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated since the change is administrative in nature, making the reporting requirements in the Technical Specifications consistent with the reporting requirements in 10CFR20.407. This does not affect any accident analyses, therefore, the probability or consequences of an accident previously evaluated will not be increased.





Standard 2--Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated since the change is administrative in nature, making the reporting requirements in the Technical Specifications consistent with the reporting requirements in 10CFR20.407. This does not affect any accident analyses, therefore, the possibility of a new or different kind of accident from any accident previously evaluated will not be created.

Standard 3--Involve a significant reduction in a margin of safety.

The proposed change will not involve a reduction in a margin of safety since the change is administrative in nature, making the reporting requirements in the Technical Specifications consistent with the reporting requirements in 10CFR20.407. This in no way affects any LCOs or surveillance requirements in the Technical Specifications, thereby maintaining the margin of safety they provide.

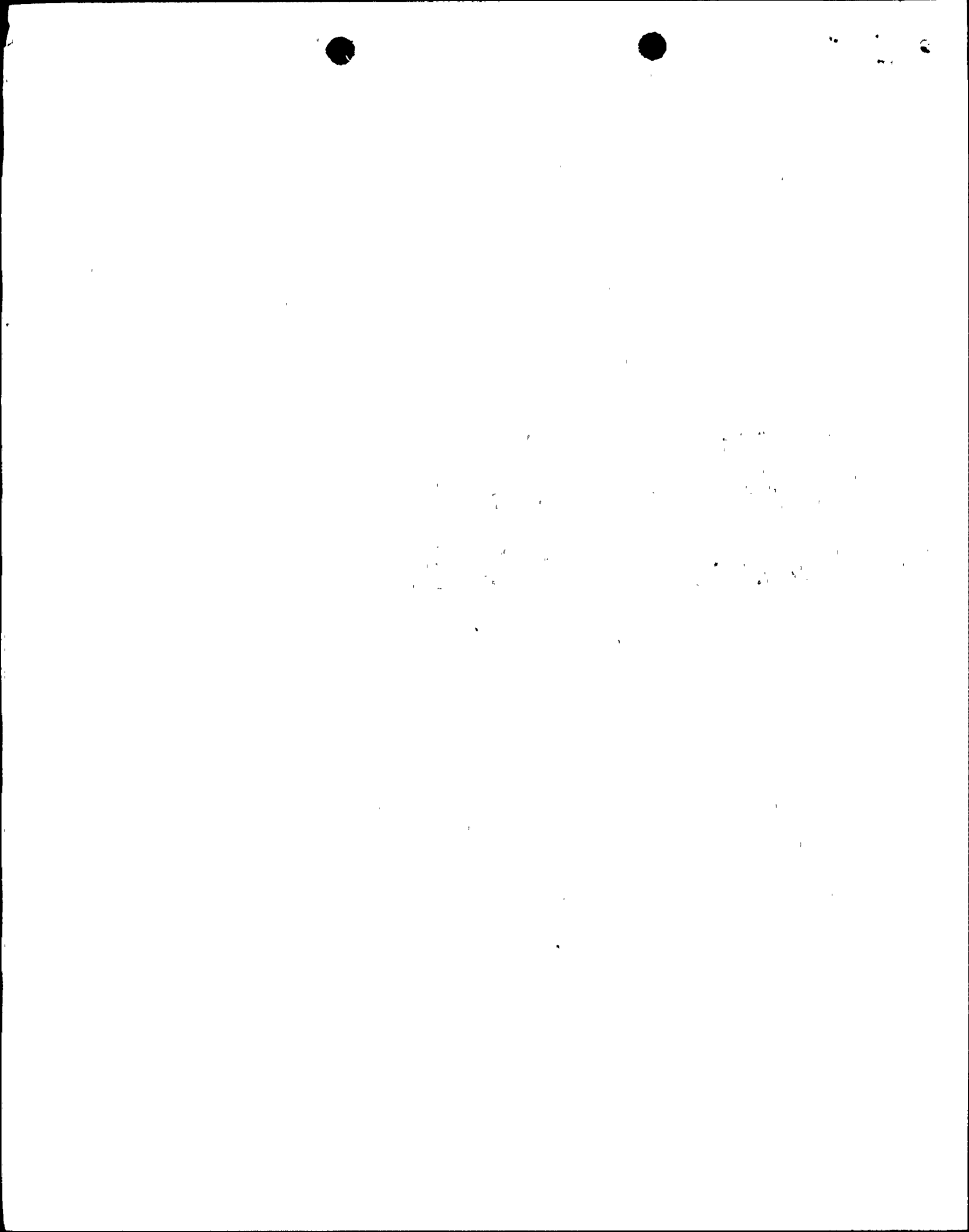
2. The proposed change matches the guidance concerning the application of the standards for determining whether or not a significant hazards consideration exists (51FR7751) by the example:

(i) 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.

#### E. SAFETY EVALUATION FOR THE AMENDMENT REQUEST

The proposed change will not increase the probability or consequences of an accident previously evaluated in the FSAR, nor will it increase the probability or consequences of a malfunction of equipment important to safety. The change is administrative in nature and does not affect any equipment important to safety or any FSAR accident analyses. Therefore, the probability or consequences of an accident previously evaluated in the FSAR or malfunction of equipment important to safety are not increased.

The possibility of an accident or malfunction of a different type than previously evaluated in the FSAR will not be created. This change modifies the due date for certain reports required by the T.S. and has no impact on any accident analyses contained in the FSAR. Therefore, the possibility of an accident or malfunction of equipment important to safety or a different type will not be created.



The proposed change will not involve a reduction in a margin of safety since the change is administrative in nature, making the reporting requirements in the Technical Specifications consistent with the reporting requirements in 10CFR20.407. This in no way affects any LCOs or surveillance requirements in the Technical Specifications, thereby maintaining the margin of safety they provide.

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed change request does not involve an unreviewed environmental question because operation of PVNGS Units 1, 2 and 3, in accordance with this change, would not:

1. Result in a significant increase in any adverse environmental impact previously evaluated in the Final Environmental Statement (FES) as modified by the staff's testimony to the Atomic Safety and Licensing Board, Supplements to the FES, Environmental Impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or
2. Result in a significant change in effluents or power levels; or
3. Result in matters not previously reviewed in the licensing basis for PVNGS which may have a significant environmental impact.

G. MARKED-UP TECHNICAL SPECIFICATION CHANGE PAGES

Administrative Controls: 6-17

