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 AUTH. NAME AUTHOR AFFILIATION
 VAN BRUNT, E. E. Arizona Nuclear Power Project (formerly Arizona Public Serv
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Supplemental application for amend to License NPF-41,
 revising Tech Specs 3.10.2 & 3.10.4, placing addl ref to Tech
 Spec 3.1.3.7 which addresses control of part-length control
 element assembly. Description of request encl. Fee paid.

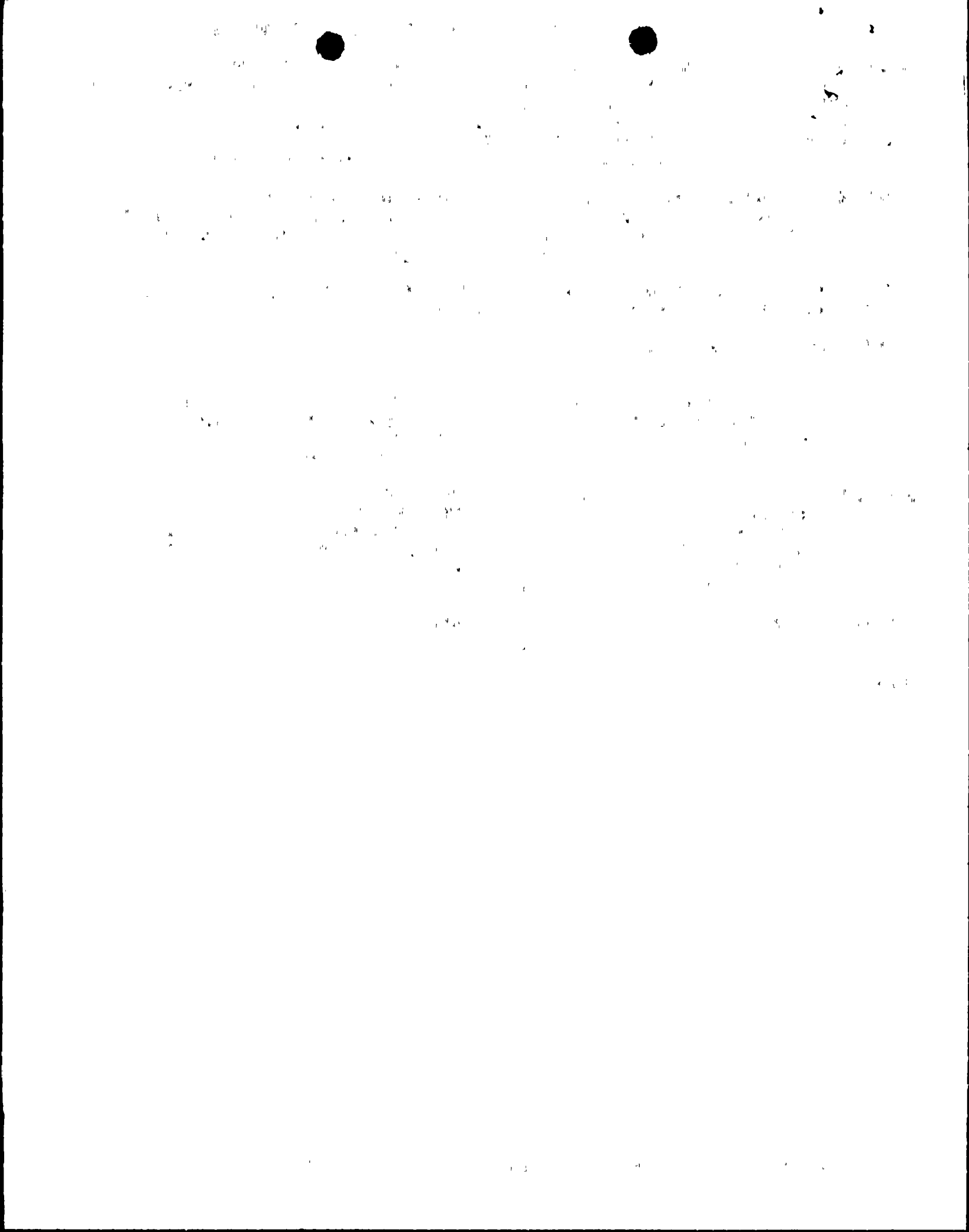
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Arizona Nuclear Power Project

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

December 11, 1987
161-00696-EEVB/LJM

Docket No. STN 50-528

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

Attention: Document Control Desk

Reference: Letter from J. G. Haynes (ANPP), to Document
Control Desk, (NRC) dated June 29, 1987
(161-00320). Subject: Reload Technical
Specification Amendment.

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Exigent Technical Specification Amendment
Request - T.S. 3.10.2 and 3.10.4
File: 87-F-005-419.05; 87-B-056-026

Attached please find proposed changes to the PVNGS Unit 1 Technical Specifications. On December 1, 1987, it was discovered that an administrative oversight had been made in the Unit 1 reload amendment request submittal (referenced letter). T.S. 3.10.2 and 3.10.4 were not changed to reference the new partlength Control Element Assembly (CEA), T.S. 3.1.3.7. This impacts the power ascension testing in that the radial peaking factor measuring test cannot be performed without taking exception to the limits set forth in T.S. 3.1.3.7. Performing the test without the use of the partlength CEAs results in the CPC constants being unverified and questions the validity of remaining at power. Presently, the window to perform the test is between January 10 thru 20 and because of this, it is requested that this T.S. request be treated as an exigent condition.

Enclosed, with this amendment request package, are the following:

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

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

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PDR ADDCK 05000528
P PDR

Adol
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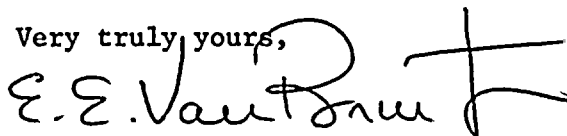


December 11, 1987
161-00696-EEVB/LJM

In accordance with the requirements of 10 CFR 170.12(c), the license amendment application fee of \$150.00 has been forwarded to the U.S. NRC License Fee Management Coordinator.

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

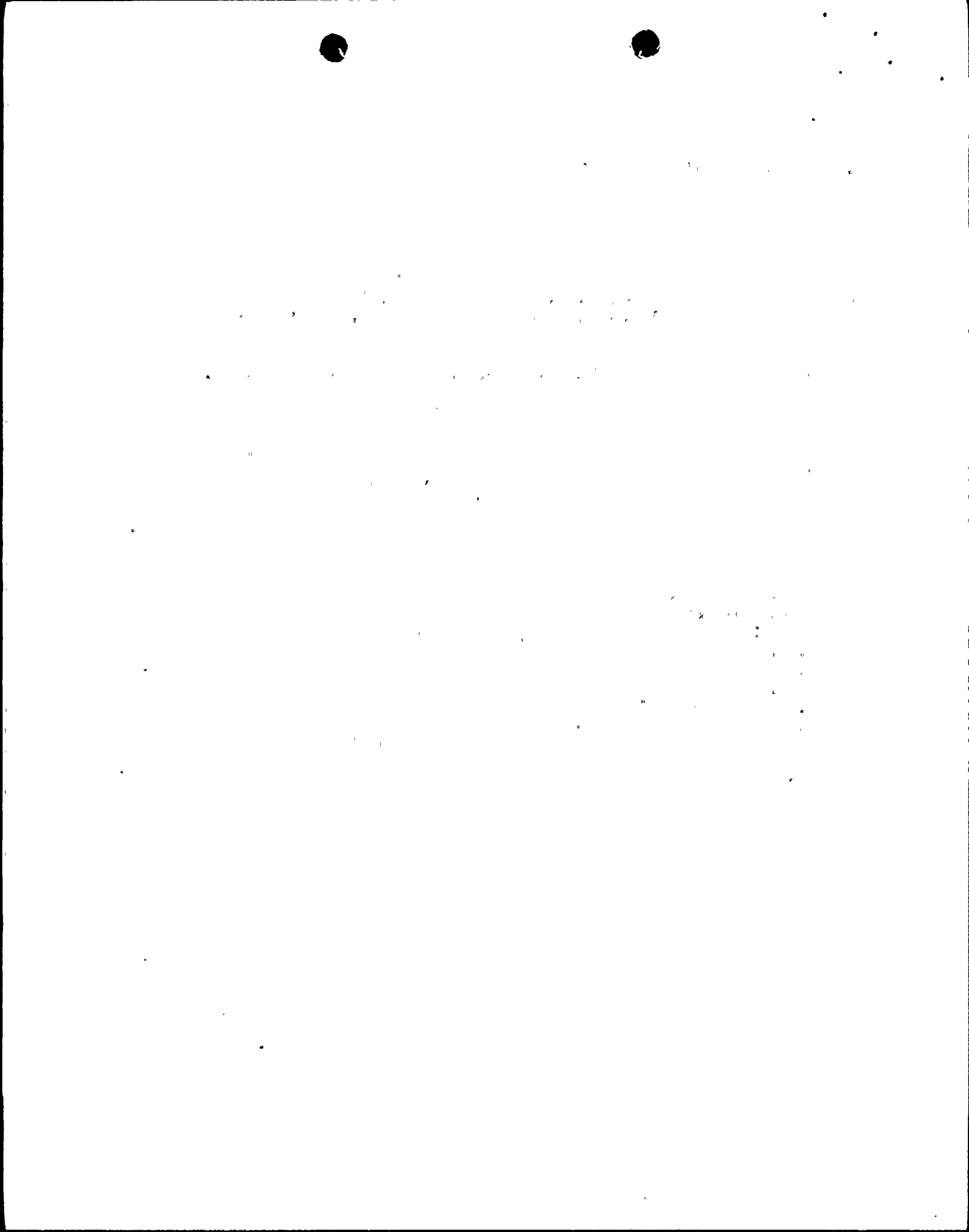
Very truly yours,



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

EEVB/LJM/cal

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



ATTACHMENT

A. DESCRIPTION OF THE TECHNICAL SPECIFICATION AMENDMENT REQUESTS

The proposed amendment places an additional Technical Specification (T.S.) reference in T.S. 3.10.2 and 3.10.4. That reference is to T.S. 3.1.3.7 which addresses control of the partlength Control Element Assembly (CEA).

B. PURPOSE OF THE TECHNICAL SPECIFICATION

The purpose of T.S. 3.10.2 is to permit individual CEAs to be positioned outside of their normal group heights and insertion limits during the performance of such physics tests as those required to (1) measure CEA worth, (2) determine the reactor stability index and damping factor under xenon oscillation conditions, (3) determine power distributions for non-normal CEA configurations, (4) measure rod shadowing factors, and (5) measure temperature and power coefficients.

The purpose of T.S. 3.10.4 is to permit the CEAs to be positioned beyond the insertion limits and reactor coolant cold leg temperature to be outside limits during Physics Tests required to determine the isothermal temperature and power coefficients.

C. NEED FOR TECHNICAL SPECIFICATION AMENDMENT

T.S. 3.10.2 and 3.10.4 provide the means of allowing the power ascension physic tests which use the partlength CEAs for power control to be performed. During the Cycle 2 reload amendment submittal, T.S. 3.10.2 and 3.10.4 were not changed to reference a new T.S., 3.1.3.7, which was created to consolidate the information concerning partlength CEA control which had been contained in T.S. 3.1.3.1 and 3.1.3.2. By not having made the change, performance of the physics tests during power ascension testing cannot be done. Since the information contained in T.S. 3.1.3.7 is the same as was in T.S. 3.1.3.1 and 3.1.3.2 referencing T.S. 3.1.3.7 in 3.10.2 and 3.10.4 is required to continue performance of the test program.

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 10 CFR 50.92. 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 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. Originally the control of the partlength CEAs was addressed by 3.10.2 and 3.10.4 but when the Cycle 2 reload amendment created a new T.S. for the partlength CEAs, the change to 3.10.2 and 3.10.4 was not included. By placing the reference to the new T.S., 3.1.3.7, into 3.10.2 and 3.10.4, 3.10.2 and 3.10.4 will return to their original scope of applicability. Since the new T.S. 3.1.3.7 contains the same information that was contained in the T.S. before the Cycle 2 amendment, referencing 3.1.3.7 in T.S. 3.10.2 and 3.10.4 will not change the probability or consequences of an accident occurring.

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. Originally the control of the partlength CEAs was addressed by 3.10.2 and 3.10.4 but when the Cycle 2 reload amendment created a new T.S. for the partlength CEA, the change to 3.10.2 and 3.10.4 was not included. By placing the reference to the new T.S., 3.1.3.7, into 3.10.2 and 3.10.4, 3.10.2 and 3.10.4 will return to their original scope of applicability. Since the new T.S. 3.1.3.7 contains the same information that was contained in the T.S. before the Cycle 2 amendment, referencing 3.1.3.7 in T.S. 3.10.2 and 3.10.4 will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The change corrects an oversight and does not reduce the margin of safety. Originally the control of the partlength CEAs was addressed by 3.10.2 and 3.10.4 but when the Cycle 2 reload amendment created a new T.S. for the partlength CEAs, the change to 3.10.2 and 3.10.4 was not included. By placing the reference to the new T.S., 3.1.3.7, into 3.10.2 and 3.10.4, 3.10.2 and 3.10.4 will return to their original scope of applicability. Since the new T.S. 3.1.3.7 contains the same information that was contained in the T.S. before the Cycle 2 amendment, referencing 3.1.3.7 in T.S. 3.10.2 and 3.10.4 will not reduce the margin of safety.

2. The proposed amendment matches the guidance concerning the application of standards for determining whether or not a significant hazards consideration exists (51 FR 7751) by example:

- (i) A purely administrative change to technical specification: 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 Technical Specification amendment will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR. The proposed change does not replace equipment or components important to safety. It is merely an administrative change.

The proposed Technical Specification amendment will not create the possibility for an accident or malfunction of a different type than any previously evaluated in the FSAR. Originally the control of the partlength CEAs was addressed by 3.10.2 and 3.10.4 but when the Cycle 2 reload amendment created a new T.S. for the partlength CEAs, the change to 3.10.2 and 3.10.4 was not included. By placing the reference to the new T.S., 3.1.3.7, into 3.10.2 and 3.10.4, 3.10.2 and 3.10.4 will return to their original scope of applicability. Since the new T.S. 3.1.3.7 contains the same information that was contained in the T.S. before the Cycle 2 amendment, referencing 3.1.3.7 in T.S. 3.10.2 and 3.10.4 will not create the possibility of a new or different type of accident or malfunction.

The proposed Technical Specification amendment will not reduce the margin of safety as defined in the bases for the technical specifications. Originally the control of the partlength CEAs was addressed by T.S. 3.10.2 and 3.10.4 but when the Cycle 2 reload amendment created a new T.S. for the partlength CEAs, the change to 3.10.2 and 3.10.4 was not included. By placing the reference to the new T.S., 3.1.3.7, into 3.10.2 and 3.10.4, 3.10.2 and 3.10.4 will return to their original scope of applicability. Since the new T.S. 3.1.3.7 contains the same information that was contained in the T.S. before the Cycle 2 amendment, referencing 3.1.3.7 in T.S. 3.10.2 and 3.10.4 will not reduce the margin of safety.

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed change request does not involve an unreviewed environmental question because operation of PVNGS Unit 1, 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; 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

Limiting Condition For Operation and Surveillance Requirements:

3/4 10-2

3/4 10-4

