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 AUTH. NAME AUTHOR AFFILIATION
 VAN BRUNT, E. E. Arizona Nuclear Power Project (formerly Arizona Public Serv
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Application for amend to License NPF-41, revising Tech Specs
 to modify requirements to continuously monitor
 concentrations of hydrogen or oxygen in waste gas holdup
 sys.

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Arizona Nuclear Power Project

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

Docket Nos. STN 50-528

161-00781-EEVB/PGN

February 2, 1988

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

ATTN: Document Control Desk

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Technical Specification Amendment -
Section 3/4.11.2.5
File: 88-F-005-419.05; 88-A-056-026

Attached please find proposed changes to the PVNGS Unit 1 Technical Specifications. The proposed change modifies the requirement to continuously monitor the concentrations of hydrogen or oxygen in the waste gas holdup system, to monitoring the concentrations in accordance with T.S. 3/4.3.3.8. This change clarifies the action required when the continuous monitoring equipment is inoperable.

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.

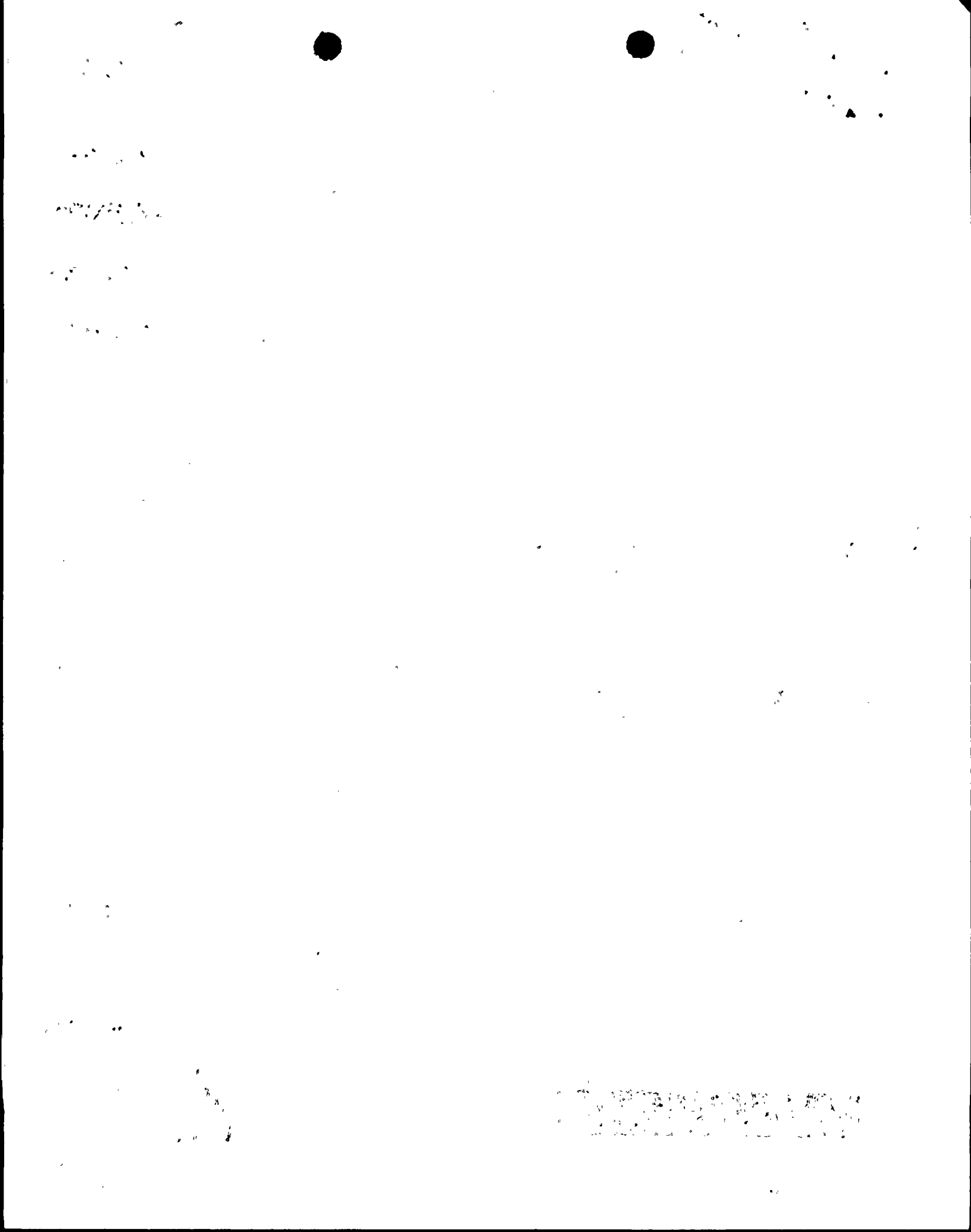
Once issued, the technical specification amendment will be implemented within thirty days of the effective date.

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 Facilities Program Coordinator of LFMB.

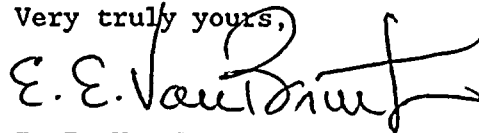
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If you have any questions, please call A. C. Rogers at (602) 371-4041.

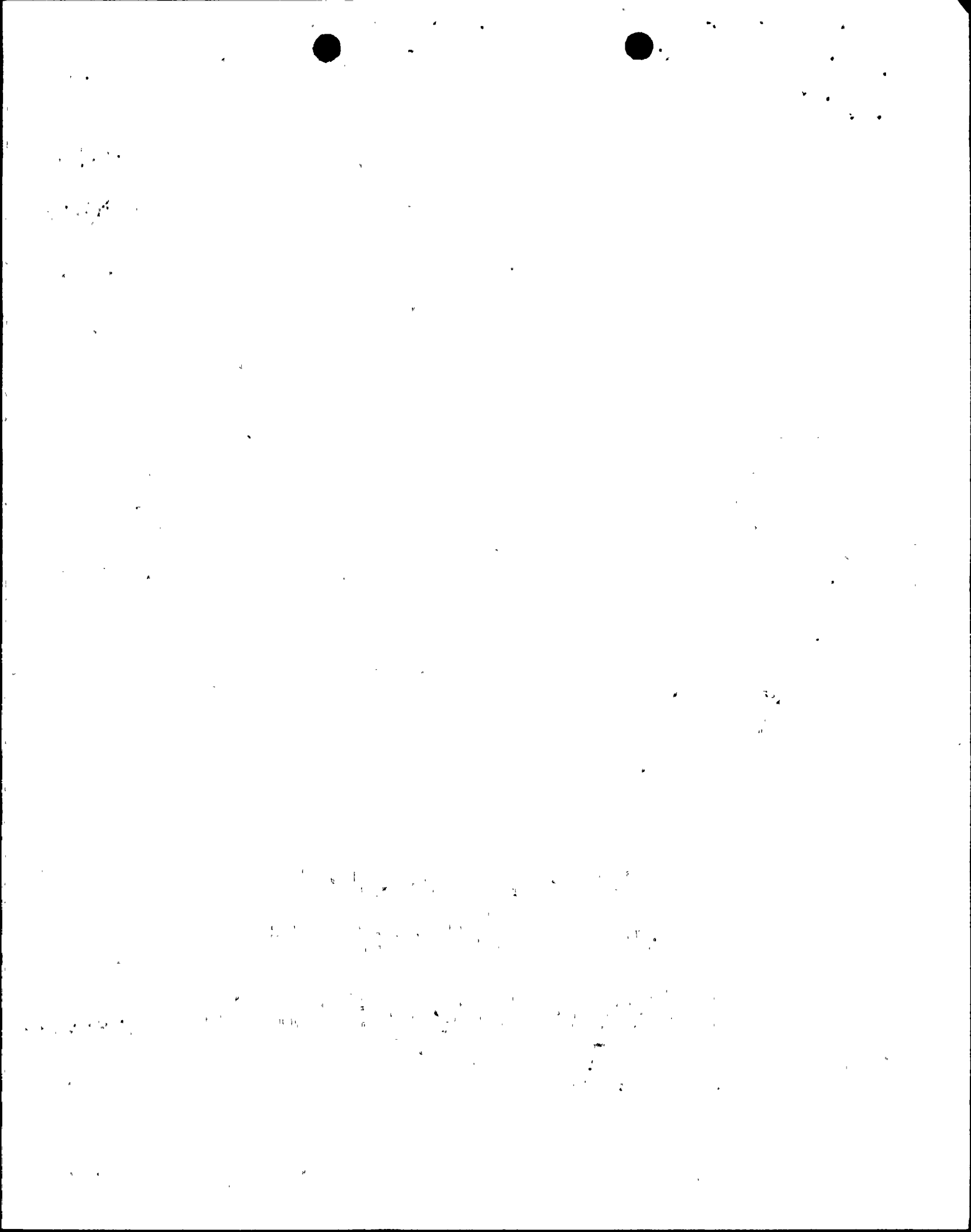
Very truly yours,



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

EEVB/PGN/lc
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 (TS) 3/4.11.2.5 currently requires the concentration of hydrogen or oxygen in the waste gas holdup system to be continuously monitored to the given concentrations. The proposed change would clarify the requirement from monitoring continuously, to monitoring in accordance with TS 3/4.3.3.8. TS 3/4.3.3.8 provides the operability requirements for the monitoring equipment, which must be operable when the waste gas holdup system is in operation. Also, TS 3/4.3.3.8 provides for grab sample monitoring when the monitoring equipment is inoperable. In addition, the basis for TS 3/4.11.2.5 is modified to delete the reference to automatic diversion to recombiners in the description of automatic control features of the waste gas holdup system.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

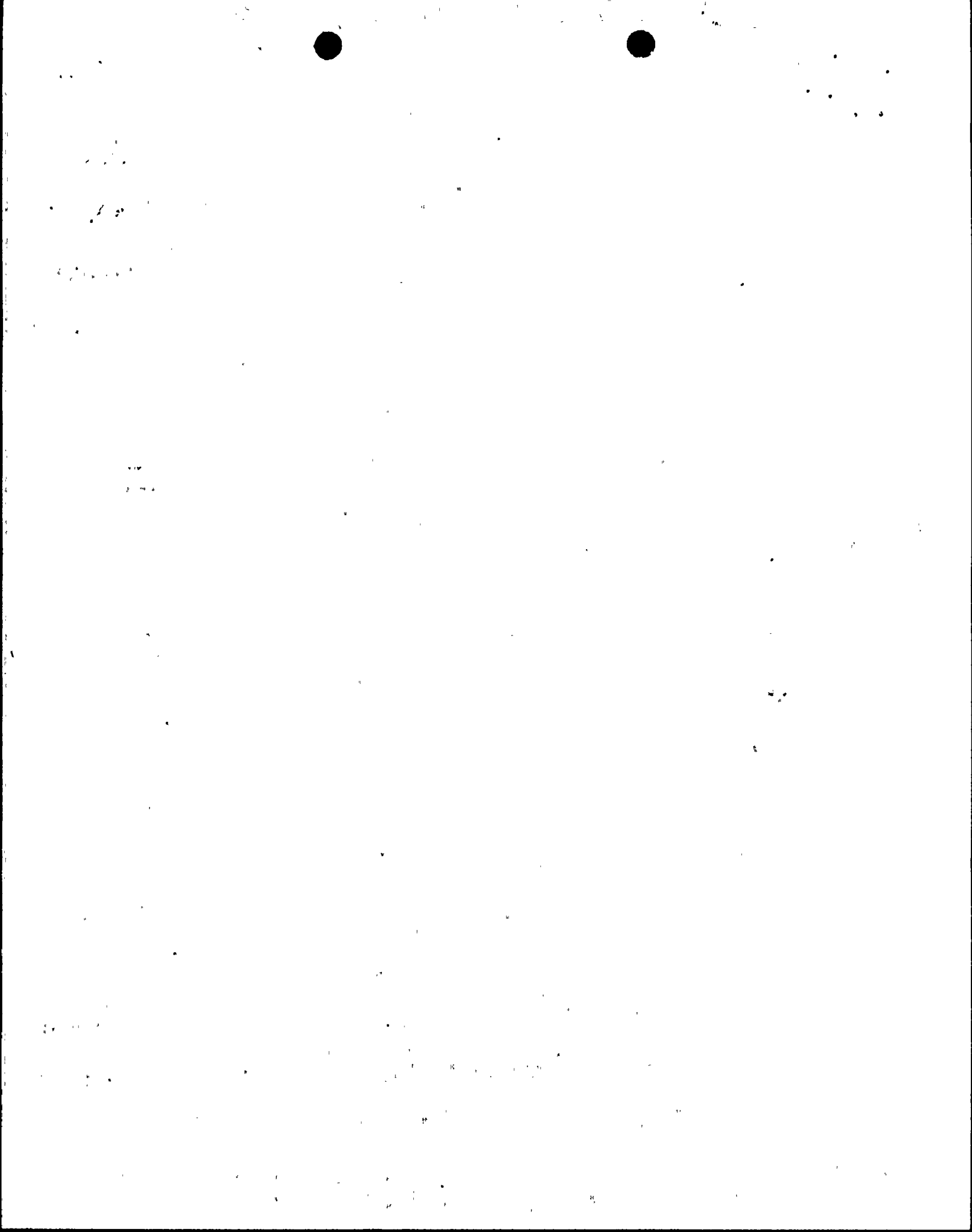
This specification is provided to ensure that the concentrations of potentially explosive gas mixtures contained in the waste gas holdup system are maintained below the flammability limits of hydrogen and oxygen. Maintaining the concentration of hydrogen and oxygen below their flammability limits provides assurance that the releases of radioactive materials will be controlled in conformance with GDC 60 of 10CFR50, Appendix A.

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

TS 3/4.11.2.5 requires the concentration of hydrogen or oxygen in the waste gas holdup system to be continuously monitored to the given concentrations. No action is specified when the monitoring equipment is inoperable. TS 3/4.3.3.8 provides operability requirements for the monitoring equipment and provides for grab sample monitoring when the equipment is inoperable. By requiring the concentration of hydrogen or oxygen to be monitored in accordance with TS 3/4.3.3.8, the concentrations are continuously monitored when the system is in operation, as in the current TS 3/4.11.2.5. Additionally, an action is specified for when the monitoring equipment is inoperable. This clarifies TS 3/4.11.2.5 and makes the PVNGS Unit 1 TS consistent with the PVNGS Unit 2 & 3 TS. The change to the bases is necessary because the waste gas holdup system design was never intended to automatically divert to the recombiners.

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 will not increase the probability or consequences of an accident previously evaluated. The waste gas system failure accident is described in FSAR section 15.7.1. This TS change does not alter the frequency of monitoring the hydrogen or oxygen concentrations in the waste gas holdup system, but clarifies the action to be taken when the monitoring equipment is inoperable. Since the actual monitoring schedule does not change, 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. The frequency of monitoring the hydrogen or oxygen concentrations in the waste gas holdup system is not changed. The change clarifies the action to be taken when the monitoring equipment is inoperable. Since the concentrations will still be monitored whenever the system is in operation, 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 reduce a margin of safety. The proposed change clarifies the required action when the monitoring equipment is inoperable by modifying T.S. 3/4.11.2.5 for monitoring concentrations of hydrogen or oxygen in the waste gas holdup system continuously, to monitoring them in accordance with TS 3/4.3.3.8. TS 3/4.3.3.8 provides operability requirements for the monitoring equipment, which must be operable when the waste gas holdup system is in operation. In addition, TS 3/4.3.3.8 provides for grab sample monitoring when the monitoring equipment is inoperable. Since the actual frequency of monitoring is not changed, the margin of safety ensured by the T.S. is not reduced.

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

- (i) A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specification, 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. The waste gas system failure accident is described in FSAR section 15.7.1. This TS change does not alter the frequency of monitoring the hydrogen or oxygen concentrations in the waste gas holdup system, but clarifies the action to be taken when the monitoring equipment is inoperable. Since the actual monitoring schedule does not change, the probability or consequences of an accident previously evaluated will not be increased.

The proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated. The frequency of monitoring the hydrogen or oxygen concentrations in the waste gas holdup system is not changed. The change clarifies the action to be taken when the monitoring equipment is inoperable. Since the concentrations will still be monitored whenever the system is in operation, the possibility of a new or different kind of accident from any accident previously evaluated will not be created.

The proposed change will not reduce a margin of safety. The proposed change clarifies the required action when the monitoring equipment is inoperable by modifying T.S. 3/4.11.2.5 for monitoring concentrations of hydrogen or oxygen in the waste gas holdup system continuously, to monitoring them in accordance with TS 3/4.3.3.8. TS 3/4.3.3.8 provides operability requirements for the monitoring equipment, which must be operable when the waste gas holdup system is in operation. In addition, TS 3/4.3.3.8 provides for grab sample monitoring when the monitoring equipment is inoperable. Since the actual frequency of monitoring is not changed, the margin of safety ensured by the T.S. is not reduced.

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 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

Limiting Conditions for Operation and Surveillance Requirements: 3/4 11-14

Bases for Limiting Conditions for Operation and Surveillance Requirements:
B 3/4 11-5

