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SUBJECT: Application for amend to License NPF-65,revising Tech Spec Surveillance Requirement 4.7.9.b.

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161-00844-EEVB/BJA
March 1, 1988

Docket No. STN 50-530

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

Attention: Document Control Desk

Reference: (1) Letter from J. G. Haynes, ANPP, to G. W. Knighton, NRC, dated December 26, 1986. Subject: Proposed Technical Specification Change - Snubber Visual Inspections.

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 3
Proposed Technical Specification Change -
Snubber Visual Inspections
File: 88-G-056-026; 88-F-005-419.05

The purpose of this letter is to request a change to the PVNGS Unit 3 Technical Specifications. The proposed change revises Technical Specification Surveillance Requirement 4.7.9.b to postpone the first inservice visual inspection for all inaccessible snubbers in Unit 3 until the first refueling outage. The remainder of the snubbers (those accessible during power operations) will be visually inspected in accordance with the current Technical Specification requirements. This proposed change is similar to the change previously submitted by Reference (1) in that it postpones the first inservice visual inspection for certain snubbers until the first refueling outage. We understand that this previous change request would have been approved by the NRC Staff had it not been withdrawn by ANPP. Enclosed within this change request package are the following:

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

A001

Pursuant to the requirements of 10CFR50.92(b)(1), and by copy of this letter, we have notified the Arizona Radiation Regulatory Agency of this request for a Technical Specification change. 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.

Very truly yours,

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

EEVB/BJA/ls
Attachment

cc: O. M. De Michele (all w/a)
G. W. Knighton
E. A. Licitra
J. B. Martin
T. J. Polich
A. C. Gehr
Director, ARRA
R. M. Diggs (w/WFD $150)

ATTACHMENT

A. DESCRIPTION OF THE PROPOSED CHANGE

This proposed Technical Specification change revises Surveillance Requirement 4.7.9.b to postpone the first inservice visual inspection for all inaccessible snubbers in Unit 3 until the first refueling outage. Presently, the Technical Specifications require the first inservice visual inspection to be conducted after 4 months but within 10 months after commencing power operations (i.e., initial Mode 1 entry).

The Technical Specifications also require categorization of the snubbers as either accessible or inaccessible during reactor operations. The accessibility determination is based upon factors such as existing radiation levels, duration of time required to perform an inspection at the snubber location, temperature, atmosphere, and the recommendations of Regulatory Guides 8.8 and 8.10. There are a total of 720 mechanical snubbers and 12 hydraulic snubbers in Unit 3. Of the 720 mechanical snubbers, 455 are inaccessible during reactor operations and 265 are accessible. Of the 455 inaccessible mechanical snubbers, all but 12 of these are located inside the containment building. Additionally, all 12 hydraulic snubbers are located inside containment and are inaccessible during reactor operations. The snubbers (mechanical and hydraulic) are part of the chemical and volume control system, Reactor Coolant System (RCS), main steam system, and safety injection system. Although the snubbers are categorized as inaccessible during reactor operations, many of the snubbers can be visually inspected when the plant is in Mode 3. Therefore, ANPP will perform visual inspections on as many of the inaccessible snubbers as possible during any unplanned reactor shutdowns. The visual inspections will continue until such time as the reactor is ready to be returned to service. In this way, ANPP plans to visually inspect a portion of the inaccessible snubbers during any unplanned reactor shutdowns prior to the refueling outage. It should be recognized that not all of the inaccessible snubbers can be inspected in this manner as scaffolding must be installed to inspect some of the snubbers and an inspection platform must be installed to inspect the containment dome snubbers. Additionally, the quantity of snubbers inspected in this manner is directly related to the number and duration of unplanned reactor shutdowns.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

The purpose of Technical Specification 3.7.9 and the associated surveillance requirements is to ensure the operability of all mechanical and hydraulic snubbers. The operability of the snubbers helps to ensure the structural integrity of the RCS and other safety related systems during and following a seismic or other event initiating dynamic loads.

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

Due to occupational radiation exposure and personnel safety considerations, the inaccessible snubbers that are the subject of this amendment request can not be visually inspected during reactor operations. Most of these inaccessible snubbers can be inspected while the plant is in Mode 3. However,

the snubbers that are located in the dome region of the containment building require Mode 5 conditions to perform the inspection. This is due to the fact that the inspection platform must be brought into containment through the containment equipment hatch that can not be opened until Mode 5 conditions are reached.

The performance of the first inservice visual inspection for the inaccessible snubbers in Unit 3 would require an outage of an estimated 2 week duration. This outage would have to be conducted sometime in the middle of the first operating cycle for Unit 3. Based upon (i) the results from previous inspections of this type in Units 1 and 2, ii) the fact that the three PVNGS units are essentially identical, and iii) Unit 3 has experienced far fewer transient events and heatup/cooldown cycles than the other two units, ANPP believes that the requirement to shut down the reactor solely to inspect these snubbers has no safety benefit.

D. BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION

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 the consequences of an accident previously evaluated.

   Basis - This proposed Technical Specification amendment does not involve a significant increase in the probability or the consequences of an accident previously evaluated. The inaccessible snubbers that are the subject of this amendment request function to ensure the structural integrity of the RCS and several other safety related systems during seismic events or other events initiating dynamic loads on the systems. The events that initiate seismic occurrences or other transients are independent of the frequency of performing snubber visual inspections. The inaccessible snubbers help to ensure that the consequences of previously evaluated accidents are not increased by ensuring the structural integrity of safety related systems. The proper operation of these snubbers is assured by the following considerations: i) the relatively short time frame involved with this amendment request, ii) the successful completion of previous inspections of this type on Units 1 and 2, and iii) a portion of these snubbers are in an inactive portion of the containment spray system. Thus, the proposed change will not increase the probability or the consequences of previously evaluated accidents.

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

Basis - This proposed Technical Specification change will not create the possibility of a new or different kind of accident from any accident previously analyzed. Proper operation of the inaccessible snubbers during seismic or transient events helps to ensure the structural integrity of the RCS and other safety related systems. No new or different types of accidents are created by this proposed change since the snubbers will operate as intended which will help to ensure that the associated mechanical systems perform as originally intended.

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

Basis - This proposed amendment does not involve a significant reduction in a margin of safety. The bases section for Technical Specification 3.7.9 states that the purpose of the snubbers is to ensure the structural integrity of the RCS and all other safety related systems during and following a seismic event or another event initiating dynamic loads. Based upon the successful completion of previous inspections of this type on Units 1 and 2, there is adequate assurance that the inaccessible snubbers in Unit 3 will perform as required to ensure the structural integrity of the RCS and other safety related systems.

2. The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (51FR7751) of amendments that are considered least likely to involve a significant hazards consideration. The proposed Technical Specification change does not match any of the examples given in 51FR7751 but this change can be described as a relief from an inspection requirement based upon the short time duration involved with the extension and successful completion of previous inspections on Units 1 and 2.

E. SAFETY EVALUATION FOR THE PROPOSED CHANGE

The proposed Technical Specification change will not increase the probability or the consequences of previously evaluated accidents nor will it create the possibility of a new or different kind of accident. This proposed amendment will only postpone the performance of the first inservice visual inspection for all inaccessible snubbers in Unit 3 until the first refueling outage. The inaccessible snubbers (mechanical and hydraulic) that are the subject of this amendment request function to ensure the structural integrity of the RCS and other safety related systems. Proper operation of the snubbers during accident situations helps to ensure the structural integrity of the safety related systems which ensures that the consequences of the previously evaluated accidents are not increased. Proper operation of these inaccessible snubbers is assured by the following considerations: (1) There is a relatively short time involved with this amendment request. The extension to the surveillance interval is estimated as approximately 6 months. This estimate is based upon expiration of the 10 month surveillance interval near the end of September, 1988 and shutdown for the first refueling outage at the beginning of April, 1989. (2) Previous experience with snubber inservice visual inspections on PVNGS Units 1 and 2 indicates that no inoperable

snubbers have been found during the performance of the visual inspections. In addition to the preservice snubber inspections, two inservice visual inspections have been conducted on Unit 1 and one inservice visual inspection has been performed on Unit 2. This data is very significant when applied to Unit 3 since Unit 3 has not experienced the number of transient events and heatup/cooldown cycles that Units 1 and 2 have. (3) A portion of these inaccessible snubbers (those located in the dome region of the containment building) are part of the containment spray system. This system has not been operated with water, subjected to transients, or subjected to the thermal and mechanical stresses associated with system operation.

This Technical Specification change will not reduce the margin of safety as defined in the basis for any Technical Specification. The basis for Technical Specification 3.7.9 concerning snubbers is to ensure the structural integrity of the RCS and other safety related systems during and following a seismic event or another event initiating dynamic loads. There is adequate assurance that the inaccessible snubbers will perform as required to ensure the structural integrity of the RCS and other safety related systems due to the considerations listed in the preceding paragraph.

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed change request does not involve an unreviewed environmental question because operation of PVNGS Unit 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 (ASLB), Supplements to the FES, Environmental Impact Appraisals, or in any decisions of the ASLB; 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 PAGE

See attached page 3/4 7-21 of the PVNGS Unit 3 Technical Specifications.