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 CONWAY, W.F.                    Arizona Public Service Co. (formerly, Arizona Nuclear Power  
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SUBJECT: Application for amends to Licenses NPF-41 & NPF-51, revising  
 TS to clarify operation when 1 or 2 CEACs out of svc.

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THE UNIVERSITY OF CHICAGO  
DIVISION OF THE PHYSICAL SCIENCES

PHYSICS DEPARTMENT  
5720 S. UNIVERSITY AVE.  
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REPORT NO. 1000

1968

**Arizona Public Service Company**

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**WILLIAM F. CONWAY**  
EXECUTIVE VICE PRESIDENT  
NUCLEAR

161-02059-WFC/KLMC  
June 20, 1989

Docket Nos. STN 50-528/529

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- Reference: (1) Letter to NRC from D. B. Karner, ANPP, dated December 14, 1988;  
Subject: Proposed Reload Technical Specification Changes  
(161-01546)
- (2) Letter from M. J. Davis, NRC to W. F. Conway, APS, dated  
June 9, 1989. Subject: Issuance of Amendment 18 to Facility  
Operating License No. NPF-74 for the Palo Verde Nuclear  
Generating Station, Unit 3 (TAC No. 71574)

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1 and 2  
Proposed Technical Specification Changes - Units 1 and 2  
File: 89-005-419.05

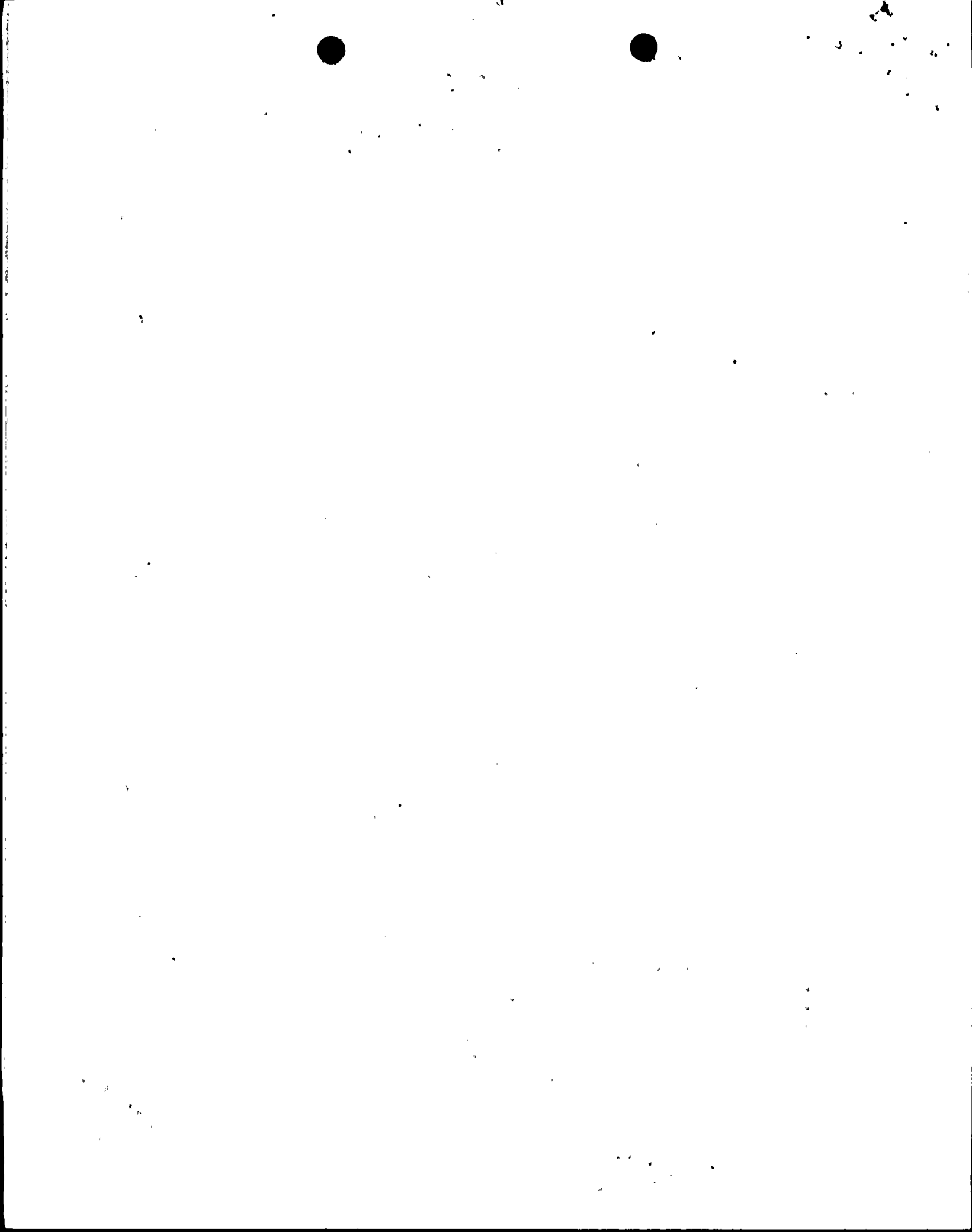
This letter is provided to request an amendment to the PVNGS Units 1 and 2 Technical Specifications. The requested amendment contains format and editorial changes to the Technical Specifications to clarify operation when one or two Control Element Assembly Calculators (CEACs) are out of service. These proposed changes are consistent with the administrative changes submitted in conjunction with the Unit 3, Cycle 2 Reload Technical Specification changes provided by Reference (1) and approved by Reference (2). We request 45 days to implement these changes after approval.

Provided in the attachment to this letter for the proposed Technical Specification changes 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 Analysis for the Amendment Request
- F. Environmental Impact Consideration Determination
- G. Marked-up Technical Specification Change Pages

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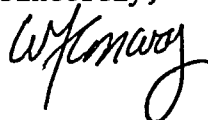
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Page 2

161-02059-WFC/KLMC  
June 20, 1989

Pursuant to 10 CFR 50.91(b)(1), by copy of this letter and its attachment, APS has notified the Arizona Radiation Regulatory Agency of this request for a Technical Specification amendment.

If you have any questions concerning this request, contact Mr. A. C. Rogers of my staff at (602) 371-4041.

Sincerely,



WFC/KLMC/jle

Attachment

cc: G. W. Knighton  
M. J. Davis  
T. L. Chan  
J. B. Martin  
T. J. Polich  
C. E. Tedford  
A. C. Gehr

## ATTACHMENT

### A. DESCRIPTION OF THE TECHNICAL SPECIFICATION AMENDMENT REQUEST

The proposed amendment modifies Technical Specifications 3.1.3.1, 3.1.3.2, 3/4.1.3.5, 3/4.1.3.6, 3/4.1.3.7, 3/4.10.4 and Table 3.3-1. These modifications are format and editorial changes to clarify operation when 1 or 2 CEACs are out of service.

Technical Specification 3/4.1.3.7 is rewritten to address the part-length CEA insertion limits specifically for 1 or 2 CEACs out of service. The changes to Table 3.3-1 are to add specific reference to the full and part-length CEA Technical Specifications (3/4.1.3.5, 3/4.1.3.6 and 3/4.1.3.7). Technical Specifications 3.1.3.2 and 3/4.10.4 are modified to include reference to Technical Specification 3.1.3.5.

This amendment also provides clarification to the text of Technical Specifications 3/4.1.3.5 and changes Technical Specification 3/4.1.3.6 to address the shutdown and regulating CEA insertion limits.

This amendment request is consistent with Technical Specification changes submitted for the Unit 3, Cycle 2 Reload and will maintain the continuity between all three unit Technical Specifications.

### B. PURPOSE OF THE TECHNICAL SPECIFICATION

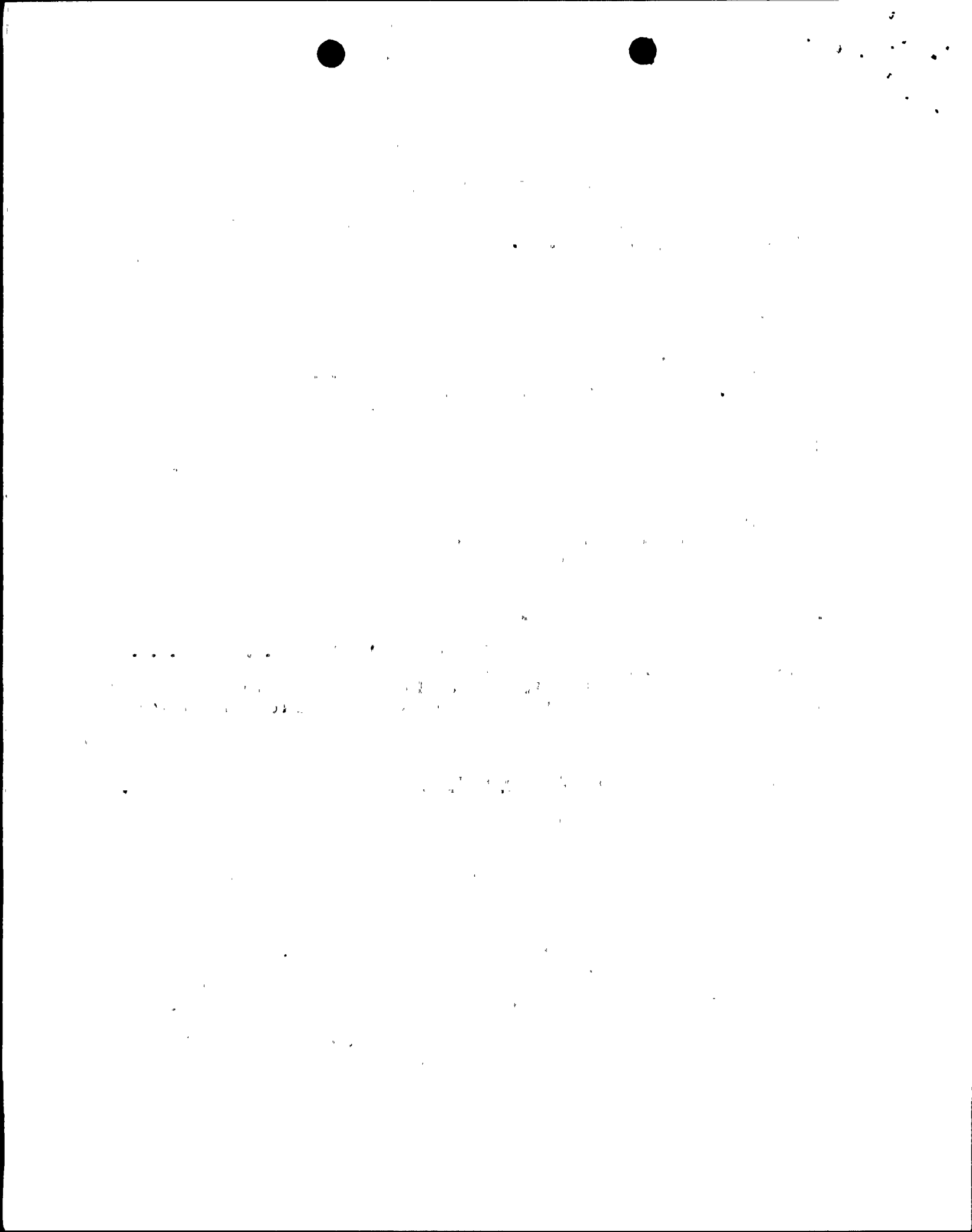
The purpose of Technical Specifications 3.1.3.1, 3.1.3.2, 3/4.1.3.5, 3/4.1.3.6 and 3/4.1.3.7 is to ensure that acceptable power distribution limits are maintained, that the minimum shutdown margin is maintained and the potential effects of CEA misalignments are limited to acceptable levels.

### C. NEED FOR TECHNICAL SPECIFICATION AMENDMENT

The primary reason for the proposed changes is to provide clarification to the Technical Specifications with respect to CEACs in or out of service. Additional editorial changes are proposed for general clarification. These changes will also maintain the consistency between all three unit's Technical Specifications.

### 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:



- (i) involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (ii) create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (iii) 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 changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because the changes provide additional assurance of proper adherence with the insertion limits. These proposed changes will increase the operator's ability to ensure proper operation of the reactor by reducing the possibility of human error by clarifying operation when 1 or 2 CEACs are out of service. Therefore, the probability or consequences of an accident previously evaluated is not increased due to these changes.

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

The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated because these changes are clarifications to provide additional assurance of proper operation when 1 or 2 CEACs are out of service. Therefore, the possibility of any accident occurring is reduced.

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

The proposed changes do not involve a significant reduction in a margin of safety because the changes provide additional assurance in that when 1 or 2 CEACs are out of service, proper operation will occur. The clarifications will ensure adherence to insertion limits which does not involve any reduction in a 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 the 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 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 modifications do not change or replace equipment or components important to safety. These changes add additional assurance that plant operations will be performed in a safe manner. Therefore, there is no increase in the probability of occurrence or the consequences of an accident occurring.

The proposed Technical Specification amendment will not create the possibility for an accident or malfunction of a different type than any previously evaluated for the FSAR. The proposed changes will increase the operator's ability to ensure proper operation when 1 or 2 CEACs are out of service. Therefore, the possibility for an accident or malfunction of a different type than previously evaluated will not be created by these modifications.

The proposed Technical Specification amendment will not reduce the margin of safety as defined in the basis for the Technical Specifications. The proposed changes will reduce the possibility of human error, thus providing additional assurance of proper operation when 1 or 2 CEACs are out of service. Therefore, the defined margin of safety will not be reduced by these changes to the Technical Specifications.

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed change request does not involve an unreviewed environmental question because operation of PVNGS Units 1 and 2, 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 Conditions for Operation and Surveillance Requirements.

3/4 1-21  
3/4 1-25  
3/4 1-28  
3/4 1-29  
3/4 1-30  
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3/4 3-7  
3/4 3-8  
3/4 10-4

