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SUBJECT: Application for amends to Licenses NPF-41,NPF-51 & NPF-74  
 changing administrative controls.

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WILLIAM F. CONWAY  
EXECUTIVE VICE PRESIDENT  
NUCLEAR

161-02133-WFC/JRP  
July 26, 1989

Docket Nos. STN 50-528/529/530

Document Control Desk  
U. S. Nuclear Regulatory Commission  
Mail Station Pl-37  
Washington, D. C. 20555

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Technical Specification Amendment Request  
Administrative Controls  
File: 89-F-005-419.05; 89-056-026

This letter is provided to request an amendment to the PVNGS Units 1, 2, and 3 Technical Specifications Section 6.5.1; Plant Review Board (PRB) and Section 6.5.2 Technical Review and Control Activities. The amendment request changes the composition of PRB to allow more management participation in matters relating to nuclear safety. Additionally, the change deletes the review of all administrative control procedures and changes, allowing PRB to reduce procedural review workload. And finally, the amendment reflects an organizational change, the addition of a Plant Director to the site staff. The changes presented herewith are administrative and constitute no safety concerns.

Enclosed with this change request are:

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

Pursuant to 10 CFR 50.91(b)(1), and by copy of this letter and attachments, we have notified the Arizona Radiation Regulatory Agency of this request for a Technical Specification change.

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161-02133-WFC/JRP  
July 26, 1989

At this time we would like to request that this amendment become effective within forty-five (45) days of issuance. Should you have any questions please call.

Sincerely,



WFC/JRP/jle

Attachments

cc: D. B. Karner (all w/attachments)  
G. W. Knighton  
M. J. Davis  
T. L. Chan  
J. B. Martin  
T. J. Polich  
C. E. Tedford



## ATTACHMENT

### A. DESCRIPTION OF AMENDMENT REQUEST

The proposed Technical Specification amendment would revise Section 6.5.1.2, Composition, in that the Operations Standards Supervisor, Mechanical Maintenance Standards Supervisor, Electrical Maintenance Standards Supervisor and the I&C Standards Supervisor would be removed from PRB. In their place would be the Plant Director; Director, Standards and Technical Support; Director, Site Services; Director, Nuclear Production Support; Director, Q.A.; Plant Managers for Unit 1, Unit 2 and Unit 3; and the Radiation Protection and Chemistry Manager.

The proposed amendment would also revise Section 6.5.1.6; Responsibilities, in that PRB would no longer be required to review all administrative control procedures and changes. It would also change the reference from 6.5.1.6c to 6.5.1.6b, based on the deletion of the above requirement and the final change corrects various titles of individuals to be in line with recent organizational changes.

### B. PURPOSE OF THE TECHNICAL SPECIFICATION

The purpose of the PRB is that it shall function to advise the Vice President - Nuclear Production on all matters relating to nuclear safety. PRB also reviews the following areas: proposed changes to Technical Specifications, tests, experiments and unplanned events that effect nuclear safety; violations of Technical Specifications; reportable events and review and documentation of judgment concerning prolonged operation in bypass, channel trip, and/or repair of defective protection channels of process variables placed in bypass since the last PRB meeting. PRB also performs special reviews and reports as requested by the PRB Chairman.

### C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

The proposed Technical Specification amendment would allow more management involvement in PRB reviews and also allow PRB to reduce procedure review workload which would increase involvement in reviewing Technical Specification violations, reportable events and nuclear safety issues. It would revise the scope of PRB responsibilities to include review of additional items with nuclear safety implications such as general safety review of procedures involving the operation of important plant equipment or the response to abnormal operating conditions. And finally, it would correct individuals titles based on organizational changes.

### 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 consequences of an accident previously evaluated.

The proposed Technical Specification change does not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed change does not alter the current design or operation of the facility. All of the changes are administrative in nature and would not increase the probability or the consequences of an accident previously evaluated.

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

The proposed Technical Specification change will not create the possibility of a new or different kind of accident from any accident previously evaluated. Since there are no changes in the way the plant is being operated, the potential for an unanalyzed accident is not created. No new failure modes are introduced. Therefore, the proposed change 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 proposed Technical Specification change does not involve a significant reduction in a margin of safety. The proposed changes do not have any adverse impact on containment integrity, systems or components important to safety or any other design feature. The proposed change is administrative. Since the proposed changes do not affect the consequences of an accident previously analyzed, there is no reduction in the margin of safety.

E. SAFETY ANALYSIS OF THE PROPOSED CHANGE REQUEST

The proposed Technical Specification change will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the UFSAR. The change revises the composition of PRB to be more management oriented; it also deletes the administrative control procedure review. Therefore, since this is an administrative change, it is concluded that previously analyzed accidents are not affected.

The proposed Technical Specification change will not create the possibility of an accident or malfunction of a different type than any evaluated previously in the UFSAR. No physical changes are being made to the facility. Since there are no changes in the way the plant is operated, the potential for an unanalyzed accident is not created, no new failure modes are introduced.





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The proposed Technical Specification change will not reduce the margin of safety as defined in the basis for any Technical Specification. The proposed changes do not have an adverse impact on equipment, components or operation of the facility. Since the proposed changes do not affect the consequences of an accident previously analyzed, there is no reduction in the margin of safety.

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed Technical Specification 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 staffs 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 PAGES

(See Attached Pages 6-7, 6-8 and 6-9).

