



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 49 TO FACILITY OPERATING LICENSE NO. NPF-41
AMENDMENT NO. 35 TO FACILITY OPERATING LICENSE NO. NPF-51
AND AMENDMENT NO. 22 TO FACILITY OPERATING LICENSE NO. NPF-74
ARIZONA PUBLIC SERVICE COMPANY, ET AL.
PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3
DOCKET NOS. STN 50-528, STN 50-529, AND STN 50-530

1.0 INTRODUCTION

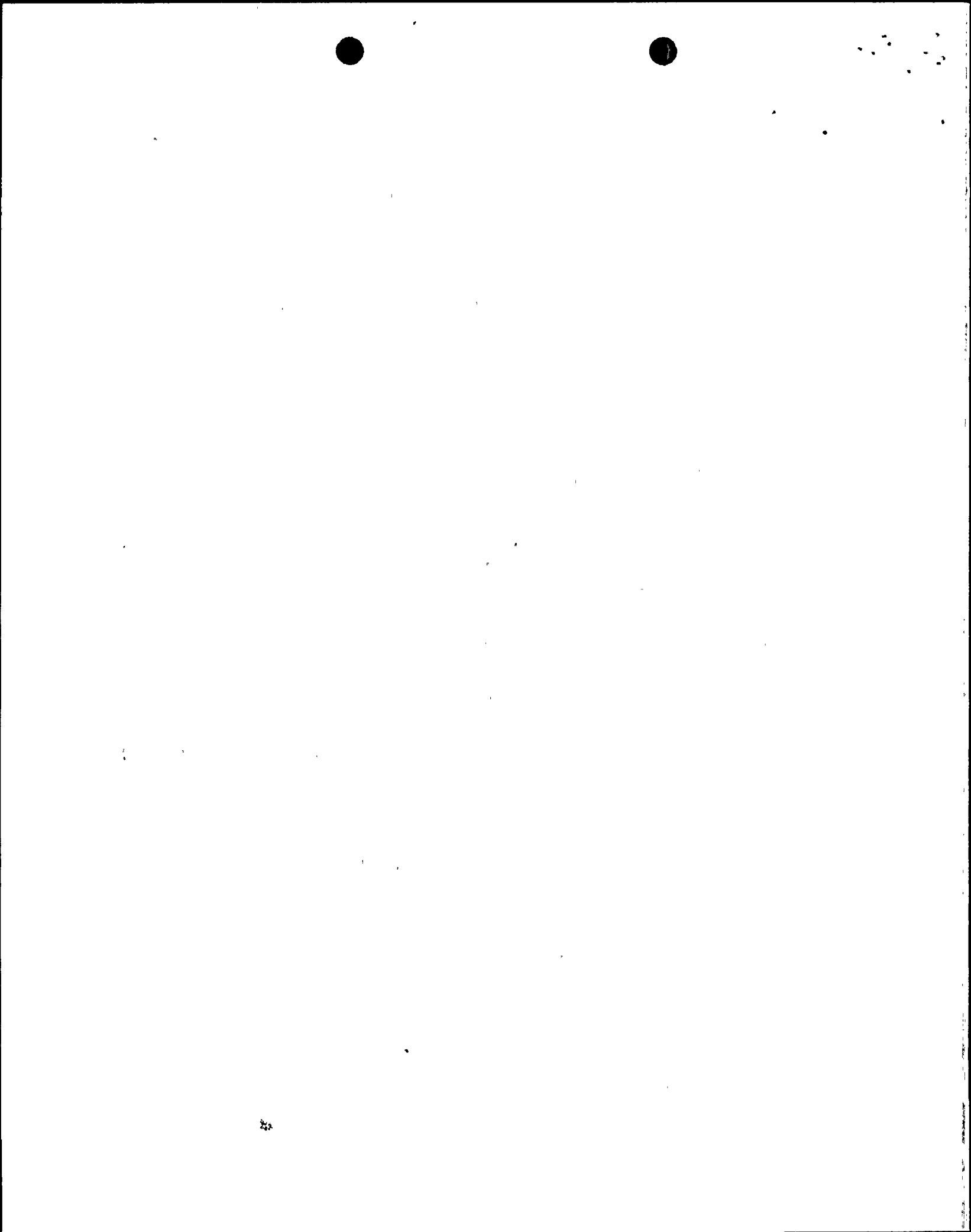
By letter dated March 8, 1990, the Arizona Public Service Company (APS) on behalf of itself, the Salt River Project Agricultural Improvement and Power District, Southern California Edison Company, El Paso Electric Company, Public Service Company of New Mexico, Los Angeles Department of Water and Power, and Southern California Public Power Authority (licensees), requested changes to the Technical Specifications (TS) for the Palo Verde Nuclear Generating Station, Units 1, 2, and 3 (Appendix A to Facility Operating License Nos. NPF-41, NPF-51, and NPF-74, respectively). The proposed changes would remove the provision of Specification 4.0.2.b that limits the combined time interval for three consecutive surveillances to less than 3.25 times the specified interval. Guidance on this proposed change to TS was provided to all power reactor licensees and applicants by Generic Letter 89-14, dated August 21, 1989.

2.0 DISCUSSION

Specification 4.0.2 includes the provision that allows a surveillance interval to be extended by 25 percent of the specified time interval. This extension provides flexibility for scheduling the performance of surveillances and to permit consideration of plant operating conditions that may not be suitable for conducting a surveillance at the specified time interval. Such operating conditions included transient plant operation or ongoing surveillance or maintenance activities. Specification 4.0.2 further limits the allowance for extending surveillance intervals by requiring that the combined time interval for any three consecutive surveillances not exceed 3.25 times the specified time interval. The purpose of this provision is to assure that surveillances are not extended repeatedly as an operational convenience to provide an overall increase in the surveillance interval.

Experience has shown that the 18-month surveillance interval, with the provision to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff

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has routinely granted requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25-percent allowance for extending surveillances that are performed on a refueling outage basis.

Extending surveillance intervals during plant operation can also result in a benefit to safety when a scheduled surveillance is due at a time that is not suitable for conducting the surveillance. This may occur when transient plant operating conditions exist or when safety systems are out of service for maintenance or other surveillance activities. In such cases, the benefit to safety of extending a surveillance interval would exceed any safety benefit derived by limiting the use of the 25-percent allowance to extend a surveillance. Furthermore, there is the administrative burden associated with tracking the use of the 25-percent allowance to ensure compliance with the 3.25 limit.

In view of these findings, the staff concluded the Specification 4.0.2 should be changed to remove the 3.25 limit for all surveillances because its removal will have an overall positive effect on safety. The guidance provided in Generic Letter 89-14 included the following change to this specification and removes the 3.25 limit on three consecutive surveillance with the following statement:

"4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval."

In addition, the Bases of this specification were updated to reflect this change and noted that it is not the intent of the allowance for extending surveillance intervals that it be used repeatedly merely as an operational convenience to extend surveillance intervals beyond that specified.

The licensee has proposed changes to Specification 4.0.2 that are consistent with the guidance provided in Generic Letter 89-14, as noted above. On the basis of its review of this matter, the staff finds that the above change to the TS for Palo Verde Nuclear Generating Station, Units 1, 2 and 3, is acceptable.

3.0 CONTACT WITH STATE OFFICIAL

The Arizona Radiation Regulatory Agency has been advised of the proposed determination of no significant hazards consideration with regard to these changes. No comments were received.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments involve a change to a requirement in the installation or use of facility components located within the restricted area as defined in 10 CFR Part 20 or a change to a surveillance requirement. The staff has determined that the amendments involve no significant increase in the



amount, and no significant change in the type, of any effluent that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued proposed findings that the amendments involve no significant hazards consideration, and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need to be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public. We, therefore, conclude that the proposed changes are acceptable.

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Dated: June 11, 1990