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Arizona Public Service Company

P.O. BOX 53999 • PHOENIX, ARIZONA 85072-3999

WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

161-03973-WFC/DAF

May 28, 1991

Docket Nos. STN 50-528/529/530

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, D. C. 20555

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Proposed Technical Specification Change to Adopt
Alternative Requirements for Snubber Visual Inspection
Intervals and Corrective Actions per Generic Letter 90-09
File: 91-005-419.05

In accordance with 10 CFR 50.90, Arizona Public Service Company (APS) submits herewith a request to amend Facility Operating Licenses NPF-41, NPF-51, and NPF-74, for PVNGS Units 1, 2, and 3, respectively. The proposed amendments will revise Technical Specification 3/4.7.9 to allow APS to perform snubber visual inspections and corrective actions during plant outages, thus reducing future occupational radiation exposure and increasing cost effectiveness. This amendment request conforms to the guidance provided by the NRC in Generic Letter (GL) 90-09, Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions, dated December 11, 1990. However, it should be noted that the GL's suggested text in Surveillance Requirement 4.7.9.c regarding snubbers found connected to an inoperable common hydraulic fluid reservoir is not relevant to incorporate as PVNGS snubbers do not utilize common fluid reservoirs.

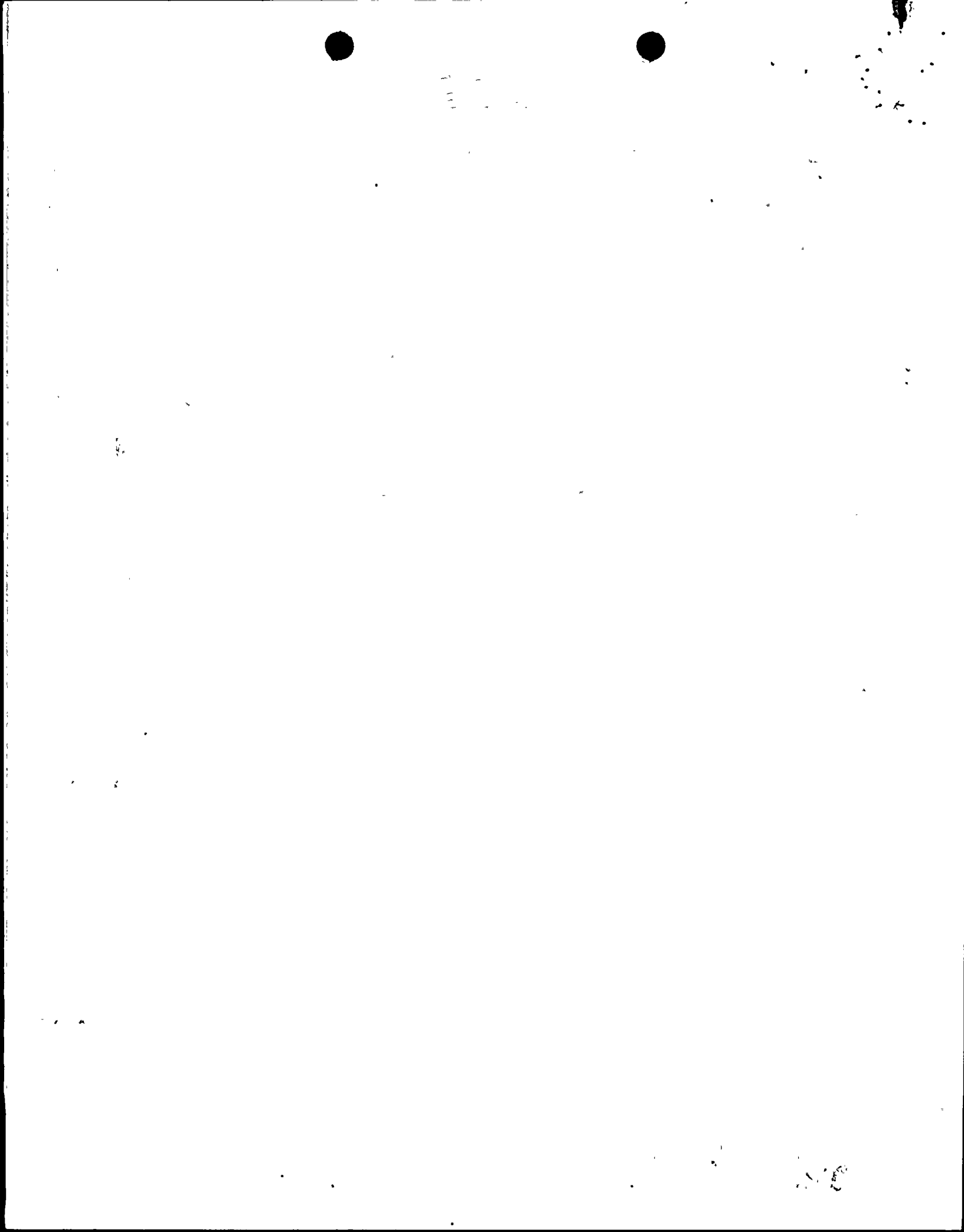
Upon approval of this amendment, the current visual inspection schedule will be recalculated using the alternative requirements for snubber visual inspection intervals.

Enclosed within this amendment request are:

- A. Description of Amendment Request
- B. Purpose of Technical Specification
- C. Need for Specification Amendment
- D. Bases 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

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

If you should have any questions, please contact Michael E. Powell of my staff at (602) 340-4981.

Sincerely,



WFC/DAF/pmm

Enclosure

cc: J. B. Martin
D. H. Coe
C. F. Tedford
A. C. Gehr
A. H. Gutterman

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U. S. Nuclear Regulatory Commission
Page Three

bcc: J. N. Bailey (1966)
R. J. Stevens (1502)
M. E. Powell (1515)
R. A. Bernier (1515)
W. E. Webster (6045)



STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, W. F. Conway, represent that I am Executive Vice President - Nuclear, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority to do so, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true and correct.

W. F. Conway
W. F. Conway

Sworn To Before Me This 28 Day Of May, 1991.

Linda B. Spill
Notary Public

My Commission Expires

June 5, 1992



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