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AUTH. NAME      AUTHOR AFFILIATION *See Proposed T.S. Changes*  
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 & NPF-74,  
making administrative changes to Tech Spec Section 6,  
"Administrative Controls."

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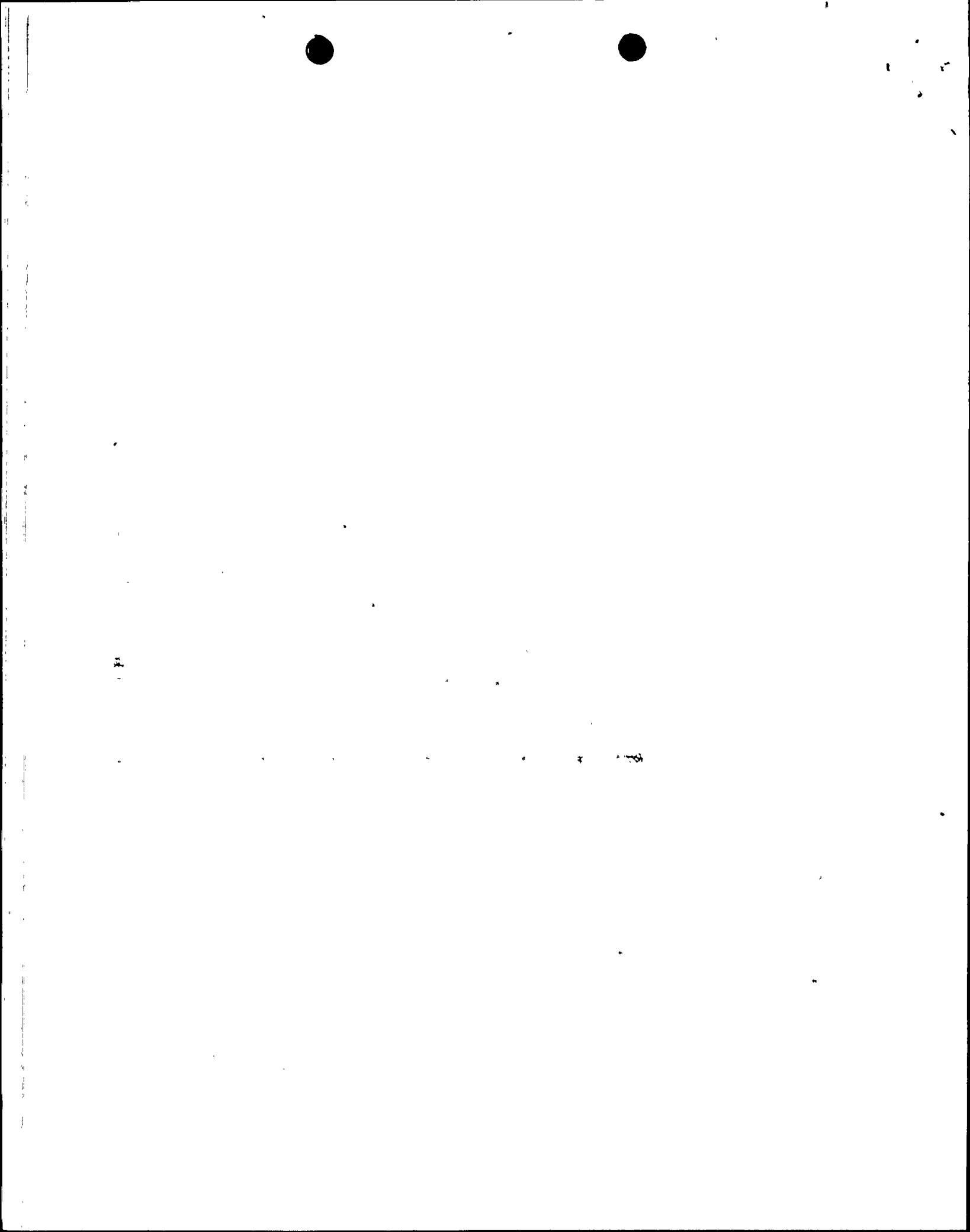
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WILLIAM F. CONWAY  
EXECUTIVE VICE PRESIDENT  
NUCLEAR

161-04141-WFC/JRP

August 28, 1991

Docket Nos. STN 50-528/529/530

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
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: 91-F-005-419.05; 91-056-026

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. These amendments are requested to make administrative changes to the PVNGS Units 1, 2, and 3 Technical Specifications, Section 6, Administrative Controls.

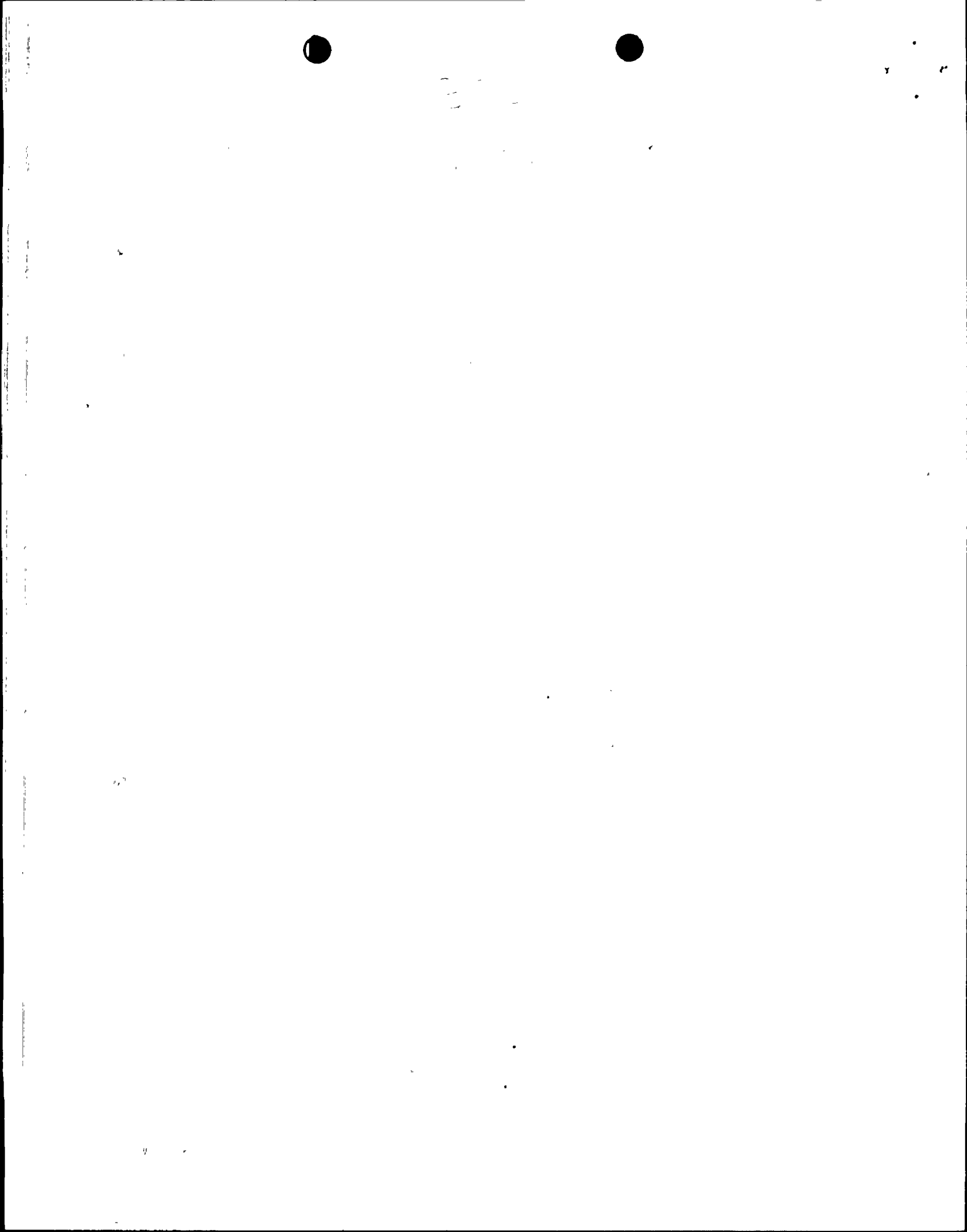
Attachment 1 to this amendment request includes the following:

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

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

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Document Control Desk  
U. S. Nuclear Regulatory Commission  
Administrative Controls  
Page Two

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

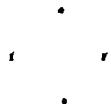
Sincerely,



WFC/JRP/pmm

Attachment

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



Faint, illegible text or markings in the center of the page, possibly bleed-through from the reverse side.

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.

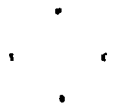
W. F. Conway  
W. F. Conway

Sworn To Before Me This 28<sup>th</sup> Day Of August, 1991.

Arene C. Corbin NEE Arene C. Clausen  
Notary Public

My Commission Expires

My Commission Expires Dec. 12, 1992



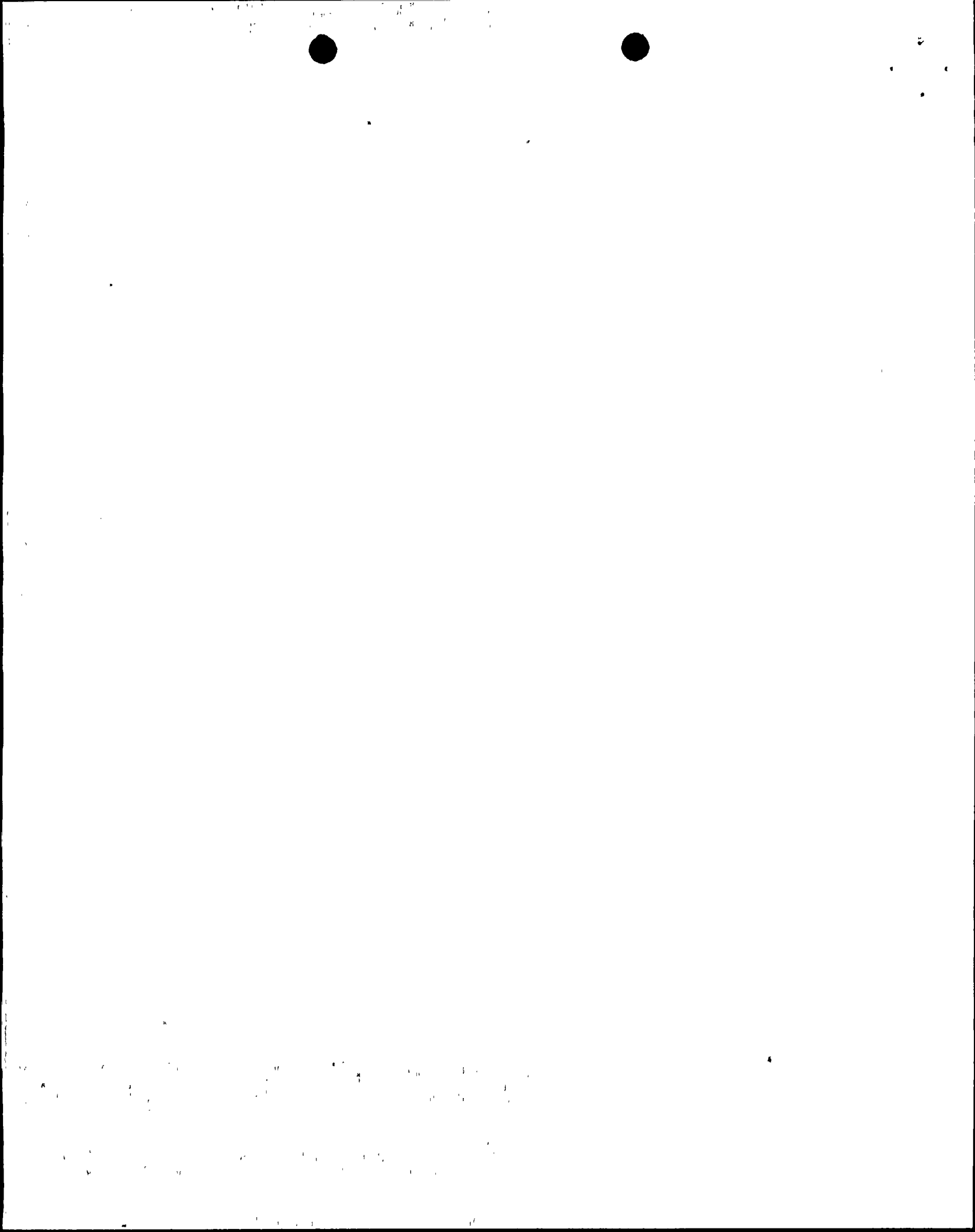


ATTACHMENT 1

A. DESCRIPTION OF AMENDMENT REQUEST

The proposed Technical Specification amendment will make changes to Section 6, Administrative Controls. The changes are administrative in nature and represent various changes in the organization discussion of the proposed changes follows:

- o The position of Assistant Vice President Nuclear Production has been deleted from the organization with the duties and responsibilities being assigned to various individuals at the senior manager level.
- o The position of Plant Director has been deleted from the organization with most of the duties and responsibilities being transferred to the Vice President, Nuclear Production.
- o The title of Director, Standards and Technical Support has been changed to Director, Technical Support. Standards development is now assigned to a senior manager for the associated functional group.
- o The title of Director, Site Services has been changed to Director, PVNGS Services.
- o Three new titles have been created; General Manager, Site Radiation Protection; General Manager, Site Chemistry; and General Manager, Training.
- o A new position has been created, Vice President, Nuclear Safety and Licensing.
- o The position of Director, Nuclear Safety and Licensing has been changed. There is now a Deputy Director, Nuclear Safety and a Director, Nuclear Licensing and Compliance. One functional area reporting to the Deputy Director, Nuclear Safety is the Independent Safety Engineering Department (formerly the Independent Safety Engineering Group).
- o The Offsite Safety Review Committee is newly formed and will replace the Nuclear Safety Group which functions to provide independent reviews and is also responsible for the audits of designated activities.
- o A clarification has been made to the number of Shift Technical Advisors (STAs) on shift for the site. A total of two (2) STAs will be on shift for the site (Per telephone conversation with T. L. Chan, NRC on June 29, 1990).
- o The General Manager, Training is responsible for the training organization in lieu of the Director, Site Services, and he reports directly to the Vice President, Nuclear Production.



- o Other various administrative changes are the addition or deletion of a word or words to better define the associated action. Also various responsibilities have been shifted from one individual to another, such that an individual who has responsibility for a group interacts directly with that group.
- o The description of the training program has been changed to reflect changes in 10 CFR 50.55, i.e., Appendix A to 10 CFR 50.55 no longer exists, it has been incorporated into the subpart.
- o A change has been made to the Technical Review and Control Activities section in that those individuals responsible for reviews performed in accordance with 6.5.2.1, 6.5.2.2, and 6.5.2.3 shall be identified in Station Administrative Procedures. This is in lieu of "shall be members of the supervisory staff, previously designated by the Director, Standards and Technical Support to perform such reviews."

The proposed changes allow greater flexibility in technical reviews which will be described in the Station Administrative Procedures.

**B. PURPOSE OF THE TECHNICAL SPECIFICATION**

Administrative Controls are the provision, recordkeeping, qualifications, organization, review and audit, and reporting necessary to assure operation of the facility in a safe manner.

**C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT**

The proposed Technical Specification changes reflect organizational changes and correct various paragraphs within Section 6 as they apply to Palo Verde. The changes are administrative in nature in that individual's titles are either being deleted from the organization or are being changed to be consistent with the objectives of achieving clearly defined responsibilities, authorities and accountabilities. The changes address improvements identified as a result of operating experiences with the current organization as well as organizational and management related issues identified by various internal and independent evaluations of the Palo Verde operation.

Palo Verde has established an Offsite Safety Review Committee (OSRC) in addition to the Nuclear Safety Group, that assesses and makes recommendations for the safe operation of PVNGS. The OSRC has been functioning for several months. As part of this Technical Specification amendment, APS is proposing that the Technical Specification review and audit function requirements, currently being performed by the Nuclear Safety Group, be performed by the OSRC. This change will remove the responsibility for the overall review of station activities from staff personnel and increase management's involvement in the review and assessment of PVNGS activities.



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The change in Section 6.15.1 would ensure that the reporting of changes to the radioactive liquid, gaseous, and solid waste treatment systems to the Commission is consistent with the implementation of the changes. The Plant Review Board (PRB) may review and approve a major change to the radioactive waste system during one reporting period; however, the change may not be implemented until an outage or other subsequent date which may be in another reporting period.

D. BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION

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 a 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 amendment does not involve a significant increase in the probability of an accident previously evaluated because the changes are purely administrative in nature. The changes are based on either organizational restructuring or clarifications. The organization has been changed to be consistent with the objectives of achieving clearly defined responsibilities, authorities and accountabilities. The changes are designed to address improvements identified as a result of operating experiences with the current organization as well as organizational and management related issues identified by internal and independent evaluations. An example is the change requested to paragraph 6.4.1. The General Manager, Training is responsible for the training organization only, whereas Director, Site Services was responsible for several diverse organizations.

Additionally, the General Manager, Training reports directly to the Vice President, Nuclear Production. Another example is that by eliminating the position of Plant Director, the V.P., Nuclear Production will assume direct responsibility for day to day operation of PVNGS. This change also eliminates one layer of management and provides for more direct communications with the plant operations. An additional change proposes to replace the Nuclear Safety Group with the Offsite Safety Review Committee. Previously, the offsite review function was conducted by the Nuclear Safety Group and reviews were conducted by staff personnel. The majority of the reviews will now be performed by a subcommittee and the results reported to the committee. A portion of the Nuclear Safety Group staff will be utilized by the Offsite Safety Review



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Committee to perform review and assessments of station activities. The remaining changes involve title changes, positions being eliminated from the organization and clarifications to various sections to more fully describe the process.

The changes as proposed will not affect equipment important to safety nor will facility operation be changed. Therefore, the proposed change does not involve a significant increase in the probability or 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 amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated because there are no changes in the way the facility is being operated. The changes are administrative which reflect a re-organization and also clarify various sections in the Administrative Controls portion of the Technical Specifications. An additional change would have changes to the radioactive waste systems reported to the Commission during the period in which the change was implemented not when the evaluation was reviewed by the PRB. This proposed change would ensure that the flow of information to the Commission is consistent with the implementation of the changes. The proposed changes are administrative and as such the potential for an unanalyzed accident is not created. Therefore, the proposed Technical Specification 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 amendment does not involve a significant reduction in a margin of safety. The changes are administrative in nature and will not affect the operation of the facility. The organizational changes are designed to improve performance of both production and service functions, and to more clearly define lines of functional responsibility and accountability. The remaining changes consist mainly of various nomenclature or clarification changes. The newly formed Offsite Safety Review Committee will have the responsibility for the overall review of station activities which would increase management's involvement in the review and assessment process. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

E. SAFETY ANALYSIS FOR THE PROPOSED AMENDMENT REQUEST

The proposed Technical Specification amendment changes are administrative in that individuals' titles are either being deleted from the organization or have been changed to be consistent with the objectives of achieving clearly defined responsibilities, authorities and accountabilities.





The changes address improvements identified as a result of operating experiences with the current organization. Other administrative changes are designed to better describe technical review and control activities. The Nuclear Safety Group is being replaced by the Offsite Safety Review Committee. This committee will perform the review and audit functions prescribed in Technical Specification 6.5.3. The committee will be composed of a chairman and a minimum of four members designated by the Executive Vice President, Nuclear and shall meet the qualifications specified in Section 4.7 of ANS 3.1 (1978, Rev. 1). The changes are designed to improve performance of both production and service functions and to more clearly define lines of functional responsibility and accountability.

No physical changes are being made to the facility, nor are there any changes being made which affect the operation of the facility and as such the proposed changes will not impact the safety analyses.

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

APS has determined that the proposed amendments involve no change in the amount or type of effluent that may be released offsite, and that there is no increase in individual or cumulative occupational radiation exposure. As such, operation of PVNGS Units 1, 2, and 3, in accordance with the proposed amendments, does not involve an unreviewed environmental safety question.

G. MARKED-UP TECHNICAL SPECIFICATION PAGES

6-1	6-9
6-2	6-10
6-5	6-11
6-6	6-12
6-7	6-14
6-8	6-24

