



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

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 68 TO FACILITY OPERATING LICENSE NO. NPF-41,
AMENDMENT NO. 54 TO FACILITY OPERATING LICENSE NO. NPF-51,
AND AMENDMENT NO. 41 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 August 28, 1991, the Arizona Public Service Company (APS or the licensee) submitted a request for 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 Arizona Public Service Company submitted this request 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. The proposed changes would revise the plant Technical Specifications (TS) based on the recommendations provided by the staff in Generic Letter (GL) 87-09 related to the applicability of limiting conditions for operation (LCO) and the surveillance requirements of the TS 3.0 and 4.0. Specifically, the licensee has requested the following revisions to TS 3.0.4, 4.0.3 and 4.0.4 as follows:

Specification 3.0.4 is revised to define when mode changes are allowed (i.e., when the affected action statements permit continued operation for an unlimited period of time), as well as defining when mode changes are not allowed (i.e., when the affected action statements require a plant shutdown). The ACTION requirements of appropriate LCO are revised to delete existing statements regarding Specification 3.0.4 non-applicability.

Specification 4.0.3 is revised to incorporate a 24-hour delay in implementing ACTION requirements due to a missed surveillance when the ACTION requirements provide a restoration time that is less than 24 hours.

Specification 4.0.4 is revised to clarify that "This provision shall not prevent passage through or to OPERATIONAL [CONDITIONS] as required to comply with ACTION requirements."

Additionally, these amendments update the Bases for TS Sections 3.0 and 4.0 in accordance with guidance provided in GL 87-09.

A number of individual TS that were requested to be revised have been removed from the Technical Specification by Amendments 62, 48, and 34 for Units 1, 2, and 3, respectively; therefore, the revisions are no longer required.

2.0 EVALUATION

The changes proposed by the licensee have been reviewed considering the limitations set forth in GL 87-09 for TS 3.0.4, 4.0.3, and 4.0.4 as follows:

Specification 3.0.4

GL 87-09 recognizes, in part, that Specification 3.0.4 unduly restricts facility operation when conformance to the ACTION requirements provides an acceptable level of safety for continued operation in any mode. For an LCO that has ACTION requirements permitting continued operation for an unlimited period of time, entry into an operational mode or other specified condition of operation should be permitted in accordance with those ACTION requirements. The restriction on change in operational modes or other specified conditions should apply only where the ACTION requirements establish a specified time interval in which the LCO must be met or a shutdown of the facility would be required or where entry into that operational mode would result in entry into an ACTION STATEMENT with such time constraints. However, nothing in the staff position stated in GL 87-09 should be interpreted as endorsing or encouraging plant startup with inoperable equipment. The GL 87-09 itself states that startup with inoperable equipment should be the exception rather than the rule.

By letter dated October 2, 1992, the licensee provided confirmation that the remedial measures prescribed by the ACTION STATEMENT for each change involving Specification 3.0.4 is consistent with the Updated Safety Analysis Report and its supporting safety analyses. Further, the licensee provided confirmation that appropriate administrative controls and procedures will be in place for limiting the use of Specification 3.0.4 exceptions in conjunction with its proposed TS change submitted in response to GL 87-09. Additionally, the proposed changes do not affect plant configuration, setpoints, operating parameters, or the operator/equipment interface.

Based on review of the licensee's proposal, and the above confirmations, we conclude in granting the exceptions proposed in response to GL 87-09 that: 1) the remedial measures prescribed by the ACTION STATEMENT for each change involving the applicability of the Specification 3.0.4 exception continue to provide a sufficient level of protection to permit operational mode changes and safe long-term operation consistent with the plant's Updated Safety Analysis Report; and 2) the licensee will place administrative controls and procedures to ensure that it will be the exception rather than the rule to startup the plant with important safety features inoperable.

We, therefore, find the following change to Specification 3.0.4 proposed by the licensee to be acceptable:

"Entry into an OPERATIONAL MODE or other specified condition shall not be made when the conditions for the Limiting Condition for Operation are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL MODE or specified condition may be made in accordance with ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time."

Specification 4.0.3

In GL 87-09, the staff stated that it is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed, because the vast majority of surveillances demonstrate that systems or components in fact are operable. The allowable outage time limits of some ACTION requirements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements apply; therefore, the TS should include a time limit that would allow a delay of the required actions to permit the performance of the missed surveillance.

This time limit should be based on considerations of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance. After reviewing possible limits, the staff concluded that, based on these considerations, 24 hours would be an acceptable time limit for completing a missed surveillance when the allowable outage times of the ACTION requirements are less than this time limit or when shutdown ACTION requirements apply. The 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with ACTION requirements before the surveillance can be completed.

This limit does not waive compliance with Specification 4.0.3. Under Specification 4.0.3, the failure to perform a surveillance requirement will continue to constitute noncompliance with the operability requirements of an LCO and to bring into play the applicable ACTION requirements.

Based on the above, the following change to Specification 4.0.3 is acceptable:

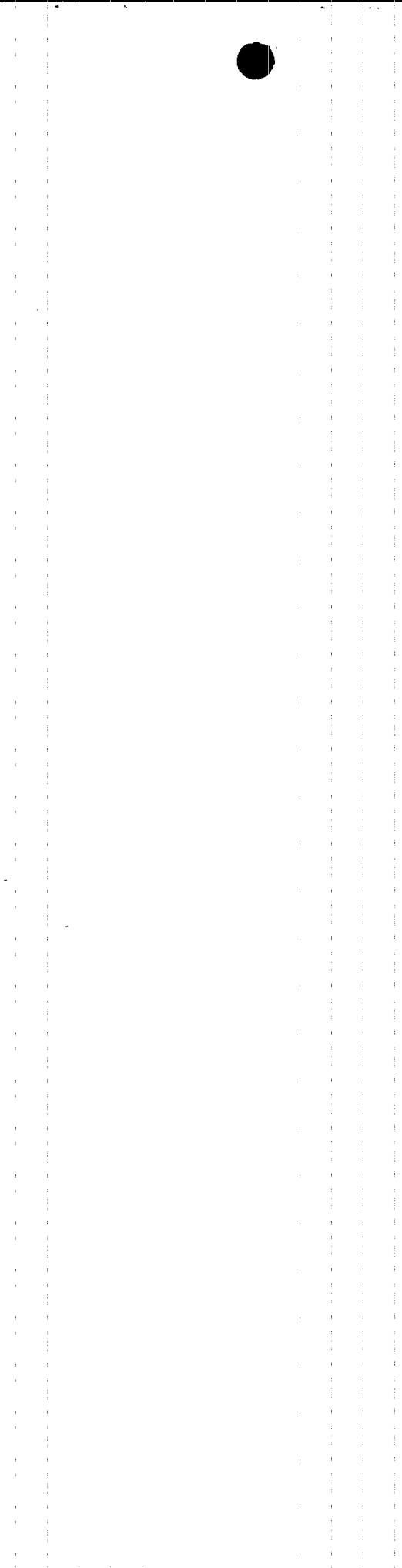
"Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. [Compliance with] the ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours."

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Specification 4.0.4

TS 4.0.4 prohibits entry into an OPERATIONAL CONDITION or other specified condition until all required surveillances have been performed. This could cause an interpretation problem when OPERATIONAL CONDITION changes are required in order to comply with ACTION statements. Specifically, two possible conflicts between TS's 4.0.3 and 4.0.4 could exist. The first conflict arises because TS 4.0.4 prohibits entry into an operational mode or other specified condition when surveillance requirements have not been performed within the specified surveillance interval. The proposed modification to resolve this conflict involves the revision to TS 4.0.3 to permit a delay of up to 24 hours in the application of the ACTION requirements, as explained above, and a clarification of TS 4.0.4 to allow passage through or to operational modes as required to comply with ACTION requirements. The second potential conflict between TS's 4.0.3 and 4.0.4 arises because an exception to the requirements of 4.0.4 is allowed when surveillance requirements can only be completed after entry into a mode or condition. However, after entry into this mode or condition, the requirements of TS 4.0.3 may be met because the surveillance requirements may not have been performed within the allowable surveillance interval.

The licensee proposes to resolve these conflicts by providing the following clarifying statement to TS 4.0.4:

- "This provision shall not prevent passage through or to OPERATIONAL [CONDITIONS] as required to comply with ACTION requirements."

The NRC staff has provided in GL 87-09 a clarification that: (a) it is not the intent of 4.0.3 that the ACTION requirements preclude the performance of surveillances allowed under any exception to TS 4.0.4; and (b) that the delay of up to 24 hours in TS 4.0.3 for the applicability of ACTION requirements provides an appropriate time limit for the completion of surveillance requirements that become applicable as a consequence of any exception to TS 4.0.4.

Consequently, the NRC staff finds the proposed changes to TS 4.0.4 acceptable.

Bases for Sections 3.0 and 4.0

GL 87-09 provides guidance and the licensee proposes to update the Bases applicable to Sections 3.0 and 4.0 in accordance with this guidance. It is noted that the 3.0.3 Bases text in GL 87-09 discussing hot shutdown has not been incorporated into this amendment request. This is because Amendments 19, 10, and 1 for Units 1, 2, and 3, respectively, approved the deletion of the time limits to achieve hot shutdown. Furthermore, the 4.0.2 Bases text in PVNGS TS 87-09 has not been incorporated because the current 4.0.2 Bases text in PVNGS TS is consistent with GL 89-14 which has superseded GL 87-09 for TS 4.0.2. This was approved in Amendments 43, 35, and 22 for PVNGS Units 1, 2, and 3, respectively. The staff finds the proposed changes to the Bases for Sections 3.0 and 4.0 acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Arizona State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

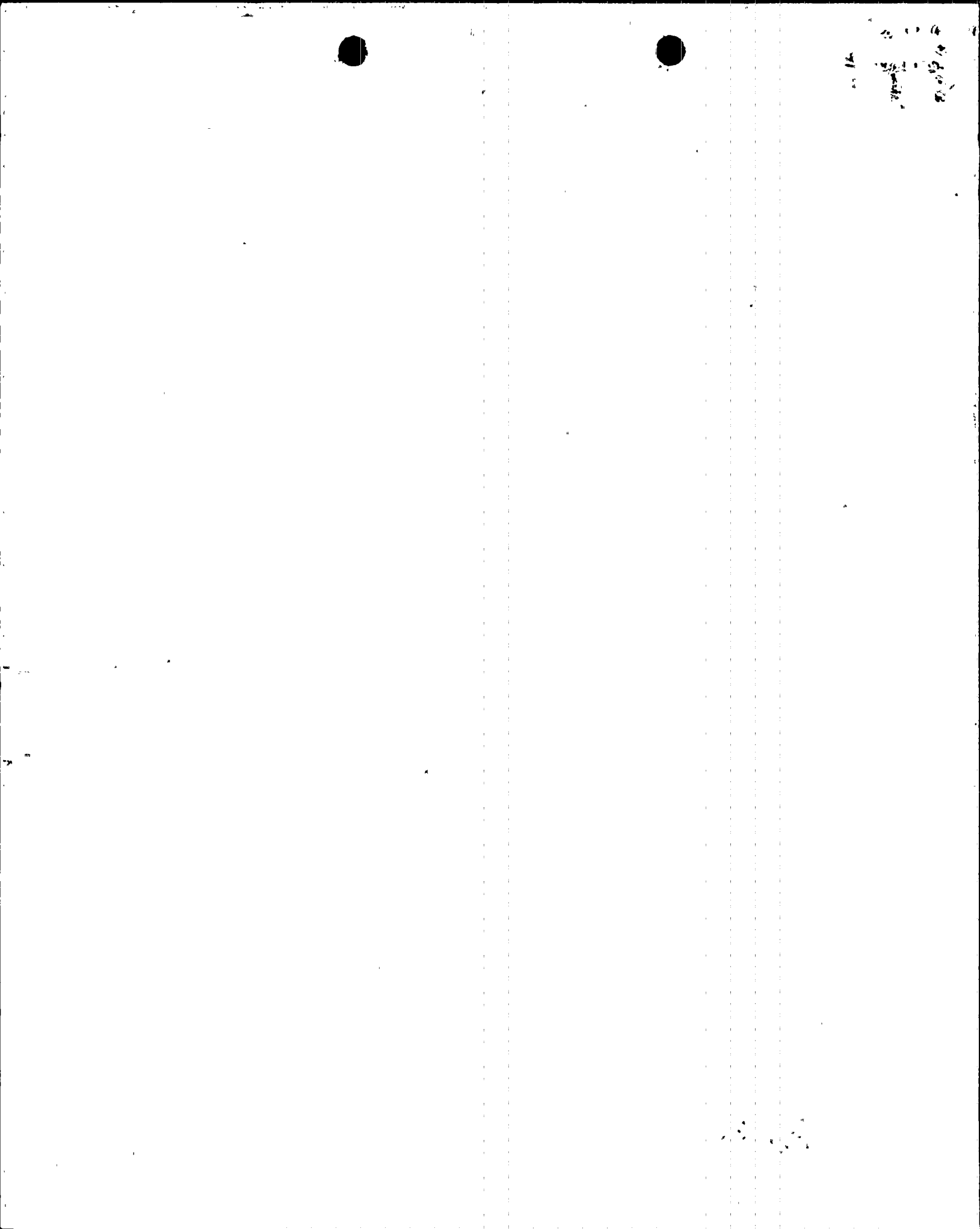
The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (56 FR 57690). 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 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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: T. Dunning
R. Assa

Date: October 27, 1992





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

October 27, 1992

MEMORANDUM FOR: Sholly Coordinator

FROM: Charles M. Trammell, Senior Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

SUBJECT: REQUEST FOR PUBLICATION IN BIWEEKLY FR NOTICE - NOTICE
OF ISSUANCE OF AMENDMENTS TO FACILITY OPERATING LICENSES
(TAC NOS. M81840, M81841, AND M81842)

Arizona Public Service Company, et al., Docket Nos. STN 50-528, STN 50-529,
and STN 50-530, Palo Verde Nuclear Generating Station, Units 1, 2, and 3,
Maricopa County, Arizona

Date of application for amendments: August 28, 1991, and supplemented by
letter dated October 2, 1992.

Brief description of amendments: These amendments revise Technical
Specifications 3.0.4, 4.0.3 and 4.0.4, update the Bases for Section 3.0 and
4.0, and change ACTION requirements of appropriate Limiting Condition for
Operation (LCO) in accordance with the guidance provided in Generic Letter
(GL) 87-09.

Date of issuance: October 27, 1992.

Effective date: October 27, 1992

Amendment Nos.: 68, 54, and 41

Facility Operating License Nos. NPF-41, NPF-51, and NPF-74: The amendments
revised the Technical Specifications.

Date of initial notice in FEDERAL REGISTER: November 13, 1991 (56 FR 57690)

The additional information contained in the letter dated October 2, 1992,
was clarifying in nature, at the request of the NRC, and within the scope

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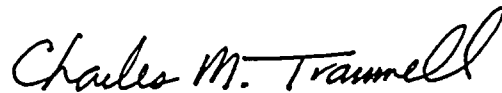
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of the initial notice, and did not affect the NRC staff's proposed no significant hazards consideration determination.

The Commission's related evaluation of the amendments is contained in a Safety Evaluation dated October 27, 1992.

No significant hazards consideration comments received: No.

Local Public Document Room location: Phoenix Public Library, 12 East McDowell Road, Phoenix, Arizona 85004



Charles M. Trammell, Senior Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation



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Local Public Document Room location: Phoenix Public Library, 12 East McDowell Road, Phoenix, Arizona 85004

Original signed by:

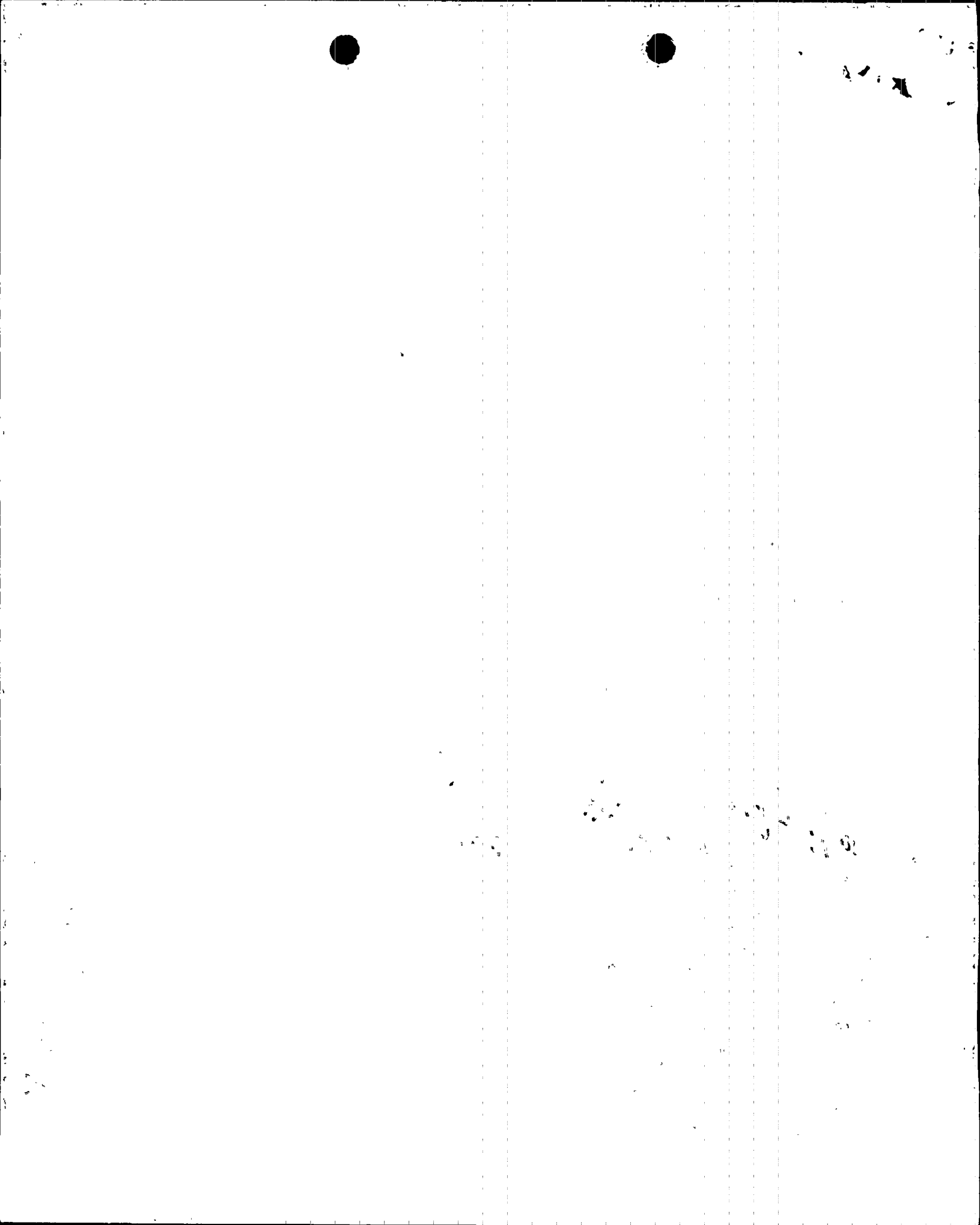
Charles M. Trammell, Senior Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

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DATE	10/15/92	10/21/92	10/21/92	10/27/92	





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October 15, 1992

MEMORANDUM FOR: Sholly Coordinator

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Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

SUBJECT: REQUEST FOR PUBLICATION IN BIWEEKLY FR NOTICE - NOTICE
OF ISSUANCE OF AMENDMENTS TO FACILITY OPERATING LICENSES
(TAC NOS. M82622, M82623, AND M82624)

Arizona Public Service Company, et al., Docket Nos. STN 50-528, STN 50-529,
and STN 50-530, Palo Verde Nuclear Generating Station, Units 1, 2, and 3,
Maricopa County, Arizona

Date of application for amendments: December 30, 1991

Brief description of amendments: These amendments revise the containment
purge supply and exhaust isolation valve ACTION statements to require the
facility to be placed in hot standby as the first stage of shutdown, rather
than hot shutdown, in six hours in the event uncorrectable problems are
encountered with these valves.

Date of issuance: October 15, 1992

Effective date: October 15, 1992

Amendment Nos.: 67, 53, and 40

Facility Operating License Nos. NPF-41, NPF-51, and NPF-74: The amendments
revised the Technical Specifications.

Date of initial notice in FEDERAL REGISTER: March 18, 1992 (57 FR 9437)

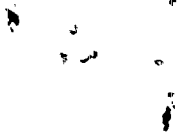
The Commission's related evaluation of the amendments is contained in a Safety
Evaluation dated October 15, 1992.

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Sholly Coordinator

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October 15, 1992

No significant hazards consideration comments received: No.

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Road, Phoenix, Arizona 85004

Charles M. Trammell

Charles M. Trammell, Senior Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation



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No significant hazards consideration comments received: No.

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Original signed by:

Charles M. Trammell, Senior Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

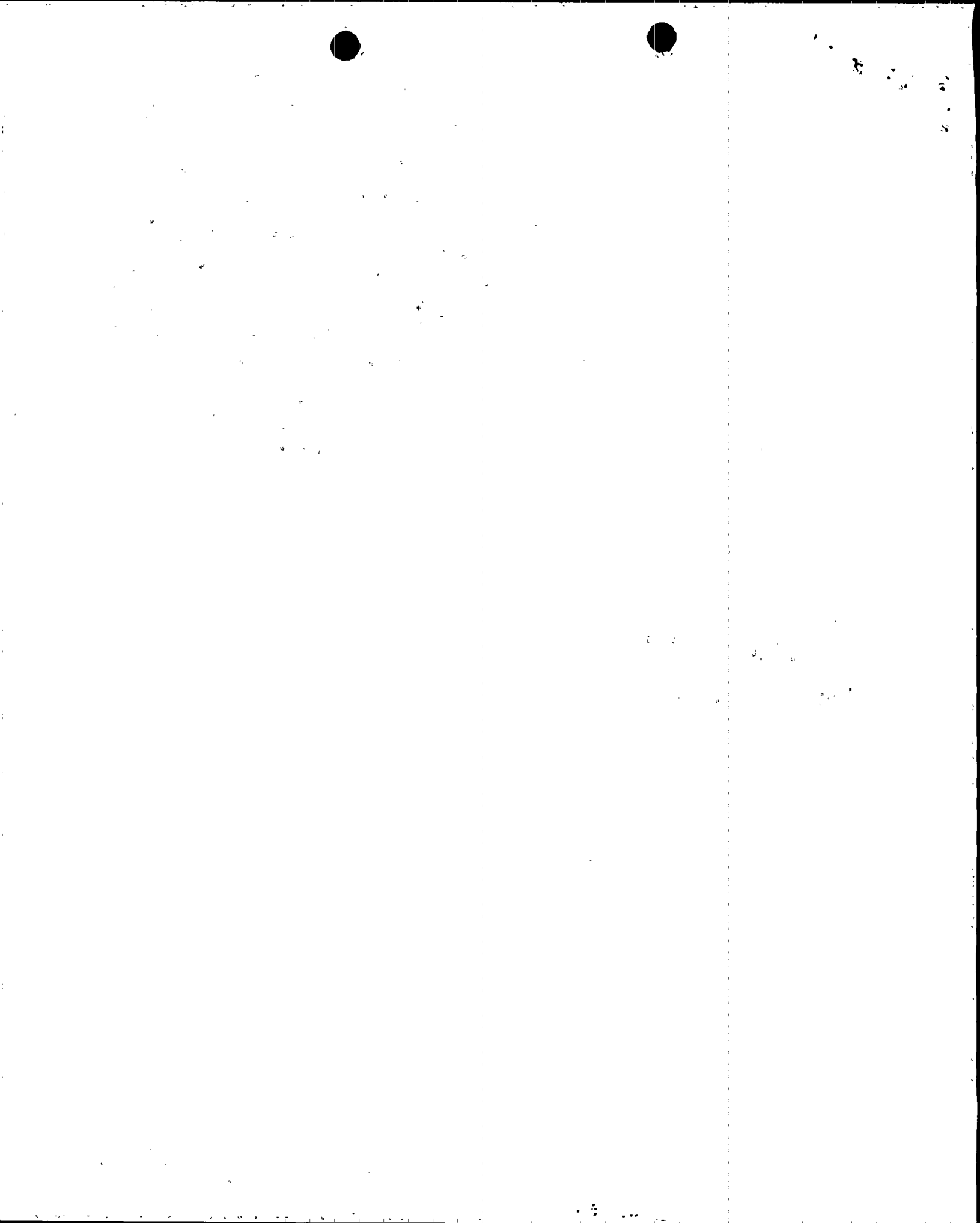
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October 15, 1992

Docket Nos. 50-528, 50-529
and 50-530

Mr. William F. Conway
Executive Vice President, Nuclear
Arizona Public Service Company
Post Office Box 53999
Phoenix, Arizona 85072-3999

Dear Mr. Conway:

SUBJECT: ISSUANCE OF AMENDMENTS FOR THE PALO VERDE NUCLEAR GENERATING
STATION UNIT NO. 1 (TAC NO. M82622), UNIT NO. 2 (TAC NO. M82623),
AND UNIT NO. 3 (TAC NO. M82624)

The Commission has issued the enclosed Amendment No. 67 to Facility Operating License No. NPF-41, Amendment No. 53 to Facility Operating License No. NPF-51, and Amendment No. 40 to Facility Operating License No. NPF-74 for the Palo Verde Nuclear Generating Station, Unit Nos. 1, 2, and 3, respectively. The amendments consist of changes to the Technical Specifications in response to your application dated December 30, 1991.

These amendments revise the containment purge supply and exhaust isolation valve ACTION statements to require the facility to be placed in hot standby as the first stage of shutdown, rather than hot shutdown, in six hours in the event uncorrectable problems are encountered with these valves.

A copy of the related Safety Evaluation is also enclosed. A notice of issuance will be included in the Commission's next regular biweekly Federal Register notice.

Sincerely,

Original signed by:
Charles M. Trammell, Senior Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 67 to NPF-41
2. Amendment No. 53 to NPF-51
3. Amendment No. 40 to NPF-74
4. Safety Evaluation

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DATE	9/22/92	10/18/92	10/13/92	10/5/92	10/15/92

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

October 15, 1992

Docket Nos. 50-528, 50-529
and 50-530

Mr. William F. Conway
Executive Vice President, Nuclear
Arizona Public Service Company
Post Office Box 53999
Phoenix, Arizona 85072-3999

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SUBJECT: ISSUANCE OF AMENDMENTS FOR THE PALO VERDE NUCLEAR GENERATING
STATION UNIT NO. 1 (TAC NO. M82622), UNIT NO. 2 (TAC NO. M82623),
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Sincerely,

A handwritten signature in cursive script that reads "Charles M. Trammell".

Charles M. Trammell, Senior Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 67 to NPF-41
2. Amendment No. 53 to NPF-51
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4. Safety Evaluation

cc w/enclosures:
See next page



Mr. William F. Conway
Arizona Public Service Company

Palo Verde

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