

Arizona Public Service Company
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WILLIAM L. STEWART
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-03011-WLS/RAB/ZJE
June 17, 1994

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-37
Washington DC 20555

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Proposed Technical Specification Amendments to Remove Five
Tables of Component Lists from the Technical Specifications (TS)
File: 94-056-026; 94-005-419.05**

Arizona Public Service Company (APS) is requesting an amendment to Technical Specification (TS) sections 3/4.3.3.5 "REMOTE SHUTDOWN SYSTEM"; 3/4.6.3 "CONTAINMENT ISOLATION VALVES"; 3/4.8.2 "ELECTRICAL POWER SYSTEMS"; and 3/4.8.4.1 "ELECTRICAL EQUIPMENT PROTECTIVE DEVICES". The proposed amendment would enhance the PVNGS TS by removing five tables of component lists in accordance with NRC Generic Letter 91-08, "Removal of Component Lists from Technical Specifications". The affected tables are: 3.3-9B, 3.3-9C, 3.6-1, 3.8-2, and 3.8-3. The references to these five tables will also be removed from the text of the TS in accordance with the sample TS change amendment provided by the NRC in Generic Letter 91-08.

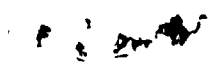
These five removed tables will be incorporated into a new document which will be administratively controlled according to the change controls provisions of the TS.

Provided in the enclosure to this letter are the following sections which support the proposed TS amendment:

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

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U.S. Nuclear Regulatory Commission
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Pursuant to 10 CFR 50.91(b)(1), by copy of this letter and enclosure, the Arizona Radiation Regulatory Agency is being notified of this request for TS amendments.

Should you have any questions, please contact Richard A. Bernier at (602) 393 5882.

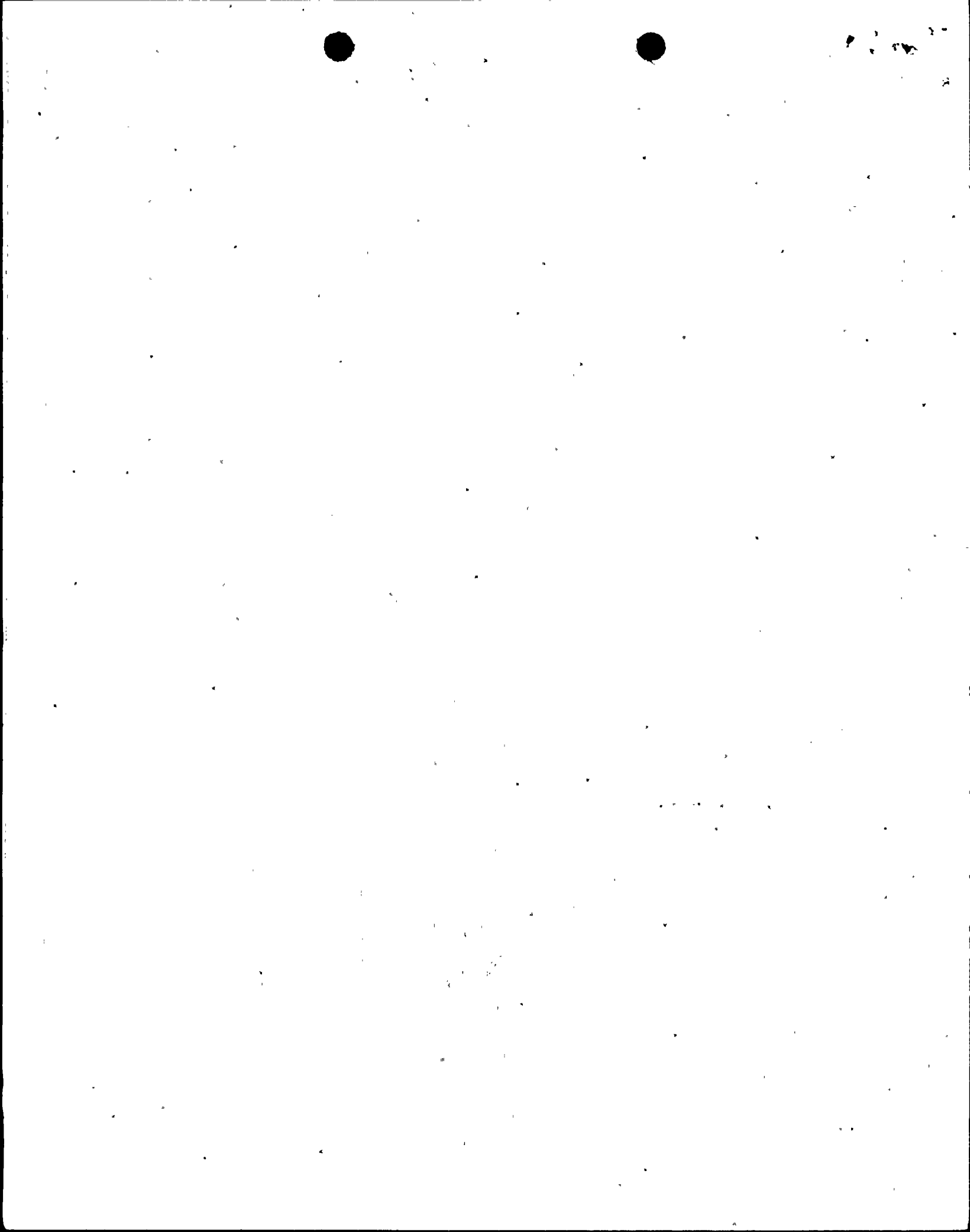
Sincerely,

WLS/RAB/ZJE/dld



Enclosure

cc: L. J. Callan
K. E. Perkins
K. E. Johnston
B. E. Holian
A. V. Godwin (ARRA)



STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, W. L. Stewart, 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 L Stewart

W. L. Stewart

Sworn to Before Me This 17th Day of June, 1994.

Ramona Wright

Notary Public

My Commission Expires


OFFICIAL SEAL
RAMONA WRIGHT
Notary Public - State of Arizona
MARICOPA COUNTY
My Commission Expires 12/31/2011



ENCLOSURE

PROPOSED TECHNICAL SPECIFICATION AMENDMENTS

TO

REMOVE FIVE TABLES OF COMPONENT LISTS

FROM THE

TECHNICAL SPECIFICATIONS



A. DESCRIPTION OF THE TECHNICAL SPECIFICATION AMENDMENT REQUEST

This amendment request proposes a Technical Specification (TS) enhancement in which five tables of component lists are removed from the TS in accordance with NRC Generic Letter 91-08.

The five tables proposed for removal from the TS are:

- 3.3-9B "REMOTE SHUTDOWN DISCONNECT SWITCHES",
- 3.3-9C "REMOTE SHUTDOWN CONTROL CIRCUITS",
- 3.6-1 "CONTAINMENT ISOLATION VALVES",
- 3.8-2 "CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES",
- 3.8-3 "MOTOR-OPERATED VALVES THERMAL OVERLOAD PROTECTION AND/OR BYPASS DEVICES".

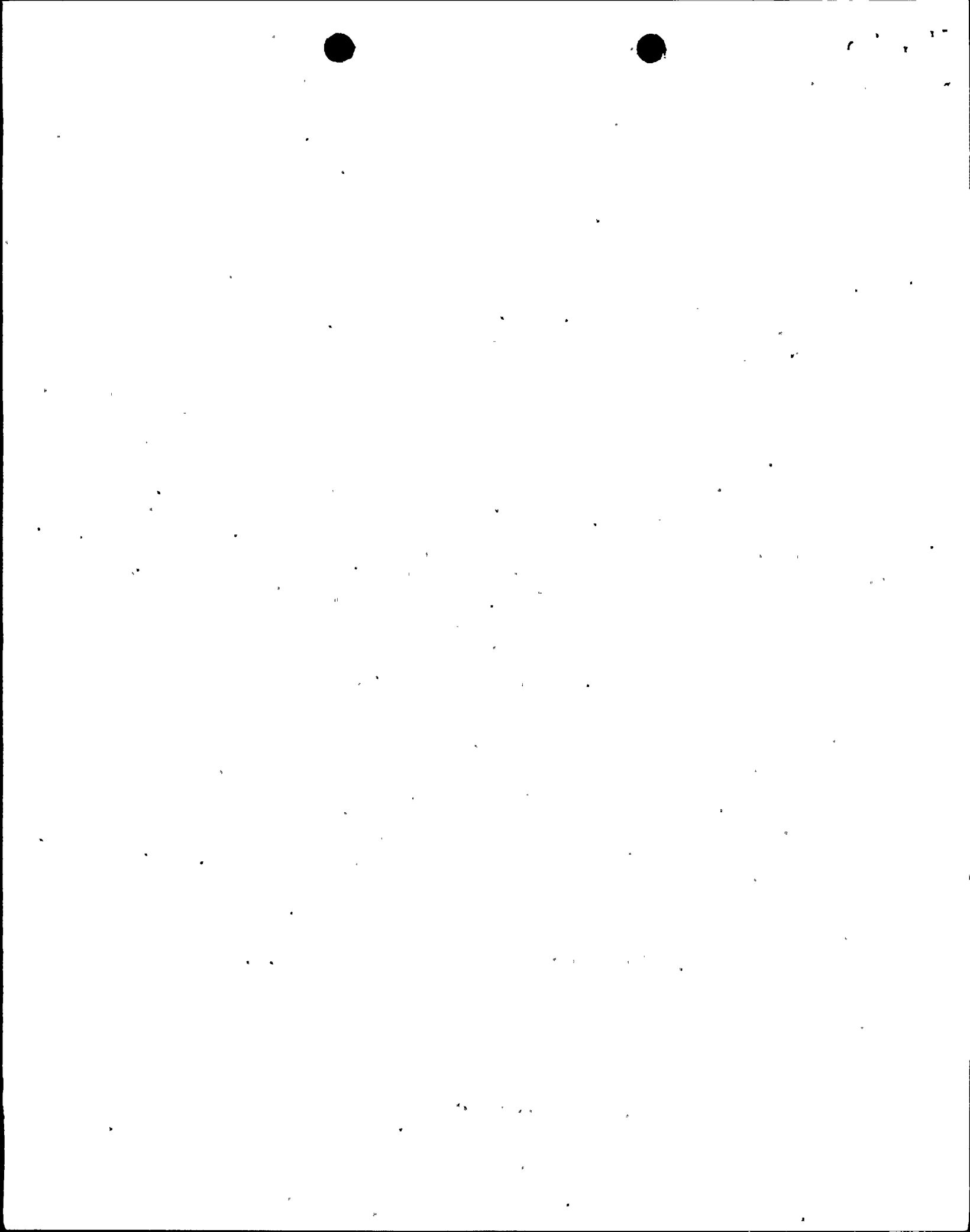
The five tables that are removed will be added to a Palo Verde Administratively Controlled document for continued control over the plant components using the 10 CFR 50.59 change control process which does not require prior NRC approval. All references to these five removed tables will be removed from the text of the TS in accordance with the sample TS amendment provided by the NRC in Generic Letter 91-08.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

The purpose of TS 3/4.3.3.5 is to maintain the operability of the Remote Shutdown System to permit safe shutdown and maintenance of Hot Standby of the Palo Verde units from locations outside the control room. This operability requirement is demonstrated by periodic channel checks and calibrations.

The purpose of TS 3/4.6.1 is to ensure that primary containment integrity is maintained and that the release of radioactive materials from the containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the safety analyses at the peak accident pressure. This requirement is demonstrated by periodic surveillance testing to determine the overall containment leakage rate and the combined leakage rate for all penetrations.

The purpose of TS 3/4.6.3 is to ensure that containment isolation valves are operable to ensure that containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or in the event of pressurization of the containment. This requirement is demonstrated by periodic surveillance testing.



The purpose of TS 3/4.8.4.1 is to ensure that all containment penetration conductor overcurrent protective devices are operable and prevent an overcurrent condition from damaging the penetration wires; and thus, protect the containment integrity. The operability of these devices ensures that safety related valves will not be prevented from performing their functions. This requirement is demonstrated by periodic surveillance testing.

The purpose of TS 3/4.8.4.2 is to ensure that the thermal overload protection bypass devices, integral with the motor starter and used in safety systems are operable, so that safety related valves will not be prevented from performing their functions. This requirement is demonstrated by periodic surveillance testing.

C. NEED FOR TECHNICAL SPECIFICATION AMENDMENT

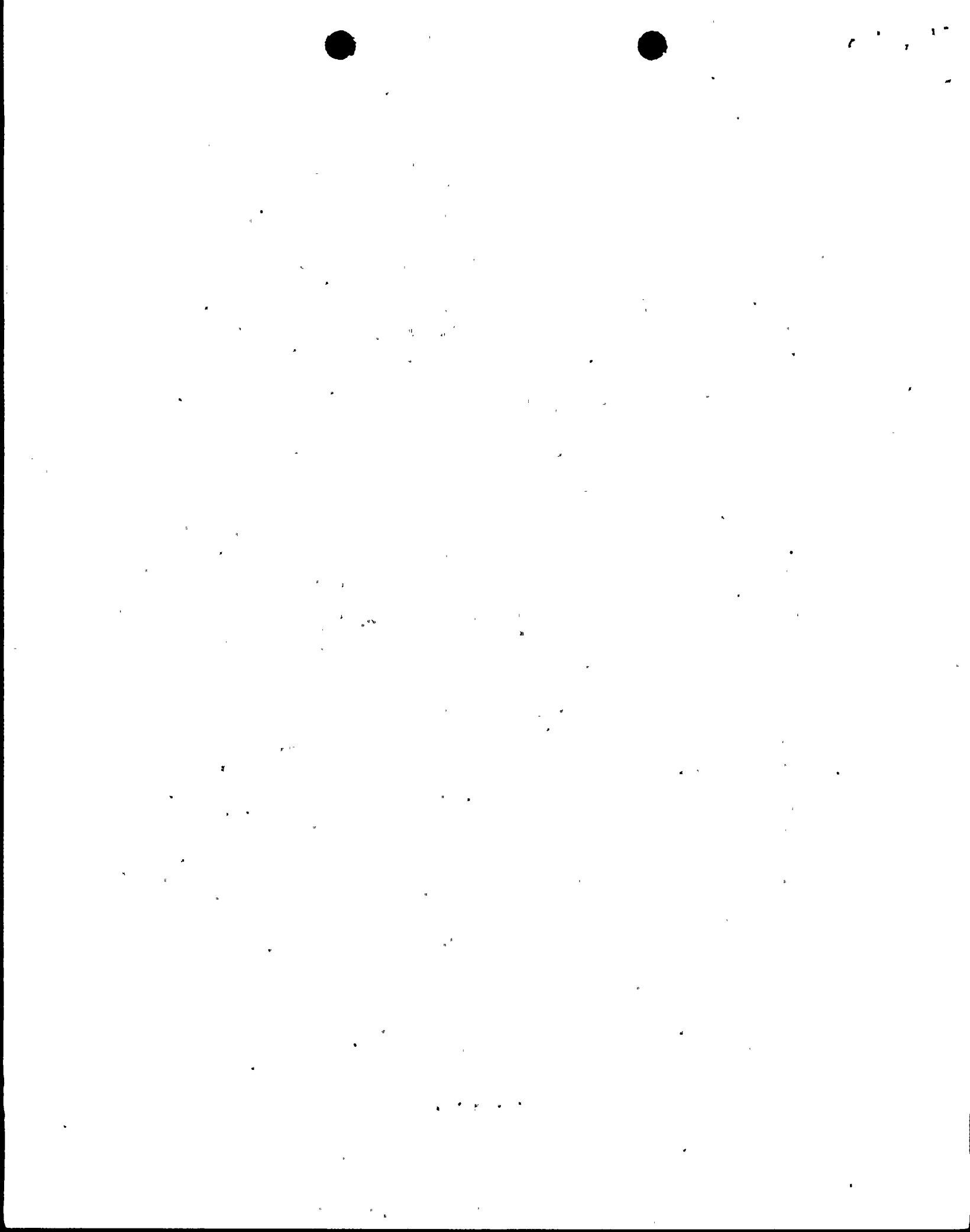
This TS amendment removes five tables of component lists from the TS. These tables contain hundreds of mechanical, electrical, and the Instrument and Control (I&C) components. Plant modifications that affect any one of these components require formal submittal of a TS amendment request to the NRC. Once these tables are removed from the TS and incorporated into PVNGS administratively controlled document, plant modifications that affect any of these components may be implemented by plant personnel using the 10 CFR 50.59 change control process without prior NRC approval. This TS amendment is consistent with NRC guidelines provided in Generic Letter 91-08. These guidelines were intended as a TS enhancement that will save time, manhours, and expenses for both the NRC and APS.

D. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

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 a different kind of accident from any accident previously evaluated; or (3) Involve a significant reduction in a margin of safety. A discussion of the above standards as they relate to this amendment request follows:

Standard 1 - Involve a significant increase in the probability or consequence of an accident previously evaluated:

The proposed amendment will remove five tables of component lists from the TS and add them to an administratively controlled document which is subject to the



change controls provisions of the TS. The new location of the affected component lists is easily retrievable. The existing TS requirements and those components to which they apply are not altered by this TS amendment. There are no changes to the operations, maintenance, surveillance, and/or qualification of any component on the removed lists. Therefore, the probability of occurrence and the consequences of any previously evaluated accident is not changed.

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

The TS requirements and the components to which they apply are not altered by this amendment. The removed component lists are added to a controlled and easily retrievable document. This amendment has no impact on plant operations, maintenance, testing, or component qualification. Therefore, the possibility of a new or different kind accident is not created by this amendment.

Standard 3 - Involve a significant reduction in a margin of safety:

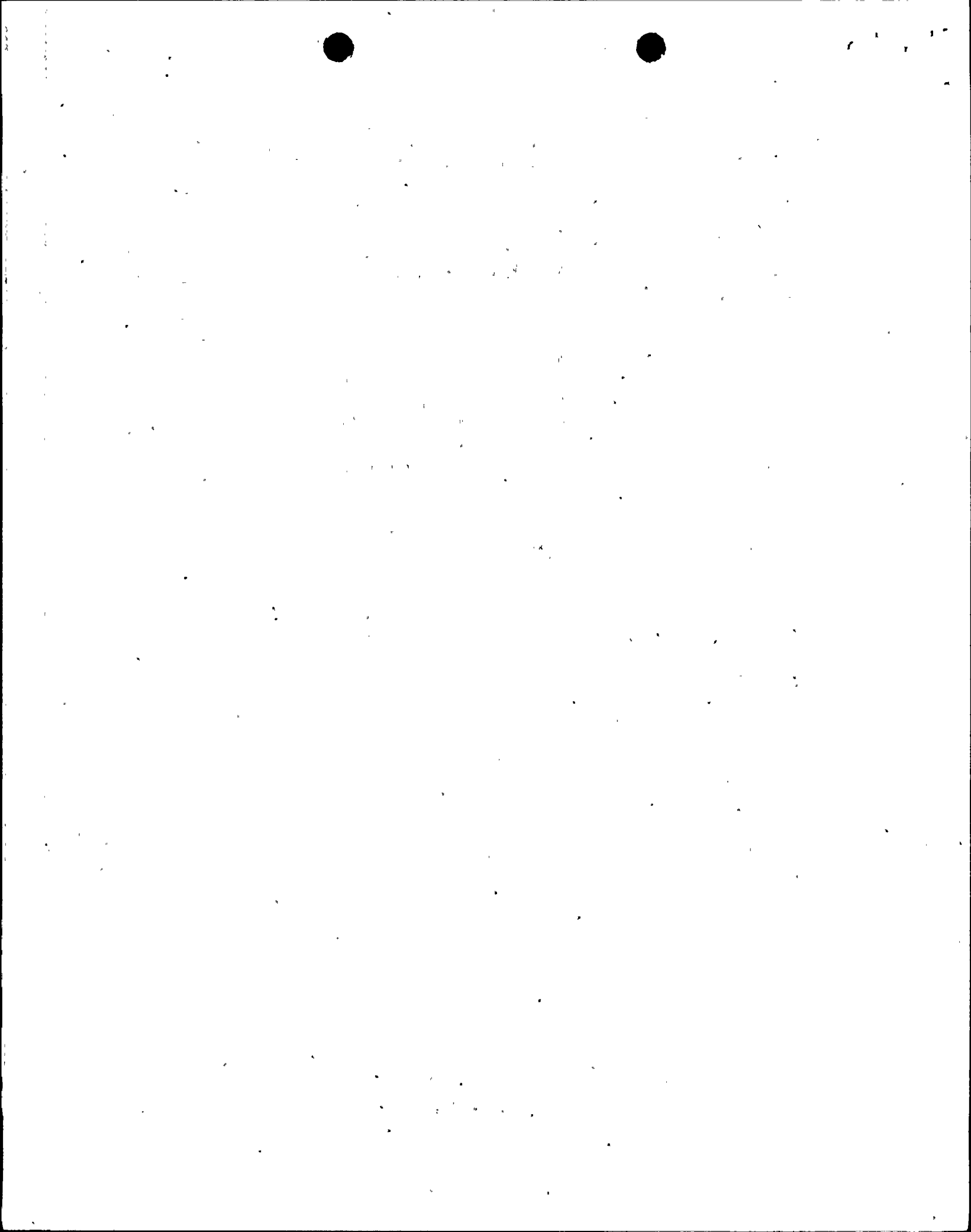
The removal of these five component lists from the TS does not alter existing TS requirements or those components to which they apply. These lists will be added to an administratively controlled document which is subject to the controls provisions of the TS. More specifically, there is no impact on safe plant shutdown, maintenance or hot standby, containment isolation capability, containment leakage rate, and/or the operability of safety related valves. Therefore, removal of these five component lists from the TS will not involve a reduction in the margin of safety.

E. **SAFETY ANALYSIS FOR THE TECHNICAL SPECIFICATION AMENDMENT REQUEST**

This proposed amendment does not change the existing TS requirements associated with each component listed on the five tables to be removed from the TS. The probability of occurrence of each previously evaluated accident and the analyzed consequences are not increased by this proposed amendment. Also, the possibility of a new or different kind of accident is not created. The margin of safety for fission product release to the atmosphere is not reduced. Therefore, APS has determined that an adequate level of safety exists to support the operation of PVNGS Units 1, 2, and 3 with this proposed amendment.

F. **ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION**

This proposed amendment does not change the existing TS requirements and restrictions associated with each component on each of the tables being removed from the TS. APS has determined the proposed amendment involves no change in the amount or type of effluent that may be released offsite; and there is no



increase in individual or cumulative occupational radiation exposure. As such, operation of PVNGS' Units 1, 2, and 3 in accordance with this proposed amendment does not create an unreviewed safety question.

G. MARKED-UP TECHNICAL SPECIFICATION PAGES

See attached pages 1-2, 3/4 6-1, 3/4 6-19, 3/4 6-20, B3/4 6-4, 3/4 8-17, 3/4 8-40, and 3/4 3-48 for Units 1, 2, and 3, respectively. Also, a marked-up copy of the "LIST OF TABLES" common to all three units is attached.

