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EXECUTIVE VICE PRESIDENT  
NUCLEAR

102-03199-WLS/SAB/NLT  
November 30, 1994

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

- References: 1. Letter 102-02352, dated November 20, 1992, "Proposed Amendment to Technical Specification Limiting Condition for Operation 3.2.1, 3.2.4, and the Associated Bases," from W. F. Conway, APS, to USNRC
2. Letter 102-02700, dated October 22, 1993, "APS Response to NRC Questions on the Proposed Amendment to Technical Specification Limiting Condition for Operation 3.2.1, 3.2.4, and the Associated Bases," from W. F. Conway, APS, to USNRC

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. STN 50-528/529/530  
Revised Marked-Up Technical Specification Pages for the  
Proposed Amendment to Limiting Condition for Operation  
3.2.1, 3.2.4, and the Associated Bases  
File: 94-005-419.05; 94-056-026**

The enclosure to this letter provides revised marked-up Technical Specification (TS) pages for the proposed amendment to TS Limiting Condition for Operation (LCO) 3.2.1, 3.2.4, and the associated bases, previously submitted to the NRC in Reference 1. The revised pages incorporate the requirement to monitor Linear Heat Rate (LHR) and Departure from Nucleate Boiling Ratio (DNBR) using the Core Protection Calculators (CPCs), while the Core Operating Limit Supervisory System (COLSS) is out of service, into the action statement of the subject LCOs. These revised TS pages provide clarification of the requirement by including it in the action statement and do not constitute an intent change. The Reference 1 submittal included this requirement in the bases section of the subject TSs in accordance with the Combustion Engineering Owners Group Standard Technical Specifications (CEOG STS) published in NUREG 1432. Subsequently, the NRC informed Arizona Public Service Company (APS) that it is appropriate to include this requirement in the action statement of the subject LCOs, since

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the basis for the increase in allowed out-of-service time is, in part, due to the monitoring with the CPCs. The NRC has indicated that the CEOG STS will be changed in the future.

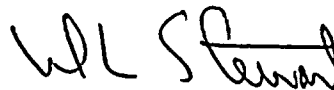
The NRC also requested that APS add 2 additional paragraphs from the CEOG STS to the associated sections of the PVNGS TS bases. The information contained in the additional paragraphs is similar to that provided in the previously submitted marked-up bases pages and the safety analysis and no significant hazards consideration provided in the Reference 1 submittal. APS has revised the marked-up bases pages in response to the NRC request.

In the Reference 2 response to NRC Question #2, APS described the procedure changes that would be implemented due to the proposed TS amendment request. The specific steps and verbiage will be finalized and implemented upon approval of the TS amendment request during the procedure change process. Please note that Response B.5 to NRC Question #2, which discussed the Surveillance Requirements (SR) performed when operating within the COLSS out-of-service limits, incorrectly referenced TS SR 4.3.2.1. The correct SRs, which will be performed for LHR and DNBR when COLSS is out of service, are TS SR 4.2.1.2 and 4.2.4.2, respectively.

Pursuant to 10 CFR 50.91(b)(1), a copy of this document is being forwarded to the Arizona Radiation Regulatory Agency.

Should you have any questions, please contact Scott A. Bauer at (602) 393-5978.

Sincerely,



WLS/SAB/NLT/rv  
Enclosure

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

