

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

	V.					
FACIL: ST ST ST AUTH.NA STEWART,	IN-50-528 Palo Vere IN-50-529 Palo Vere IN-50-530 Palo Vere AME AUTHOR A ,W.L. Arizona I NAME RECIPIE	de Nuclear S de Nuclear S de Nuclear S AFFILIATION Public Servi NT AFFILIATI	94/11/30 NOTARIZED tation, Unit 1, Ari tation, Unit 2, Ari tation, Unit 3, Ari ce Co. (formerly Ar ON ranch (Document Con	zona Publi zona Publi zona Publi rizona Nucl	05000529 05000530 ear Power	f
SUBJECT: Application for amends to licenses NPF-41,NPF-51 & NPF-74 to TS re revised marked-up TS pages for proposed amend to TS LCO 3.2.1,3.2.4 & associated bases.						
4	•			0	1.1.	(
DISTRIBUTION CODE: A001D COPIES RECEIVED:LTR / ENCL / SIZE: 2+17 TITLE: OR Submittal: General Distribution						F
st	TANDARDIZED PLANT tandardized plant. tandardized plant.				05000528 05000529 05000530	
	•					٦
	RECIPIENT ID CODE/NAME PD4-2 LA HOLIAN, B	COPIES LTTR ENCL 1 1 1 1			eL.	١
INTERNAL:	ACRS NRR/DE/EELB NRR/DRPW NRR/DSSA/SRXB	6 6 6 C 1 1 1 1 1 1	FILE CENTER 01 NRR/DRCH/HICB NRR/DSSA/SPLB NUDOCS-ABSTRACT	1 1 1 1 1 1 1 1		1

0

1

NRC PDR

1

1

1

## NOTE TO ALL "RIDS" RECIPIENTS:

OGC/HDS2

EXTERNAL: NOAC

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM PI-37 (EXT. 504-2083 ) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 20 ENCL 19

B-AA

R

D

M

Ε



10 CFR 50.90

## Arizona Public Service Company P.O. BOX 53999 PHOENIX, ARIZONA 85072-3999

WILLIAM L. STEWART 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

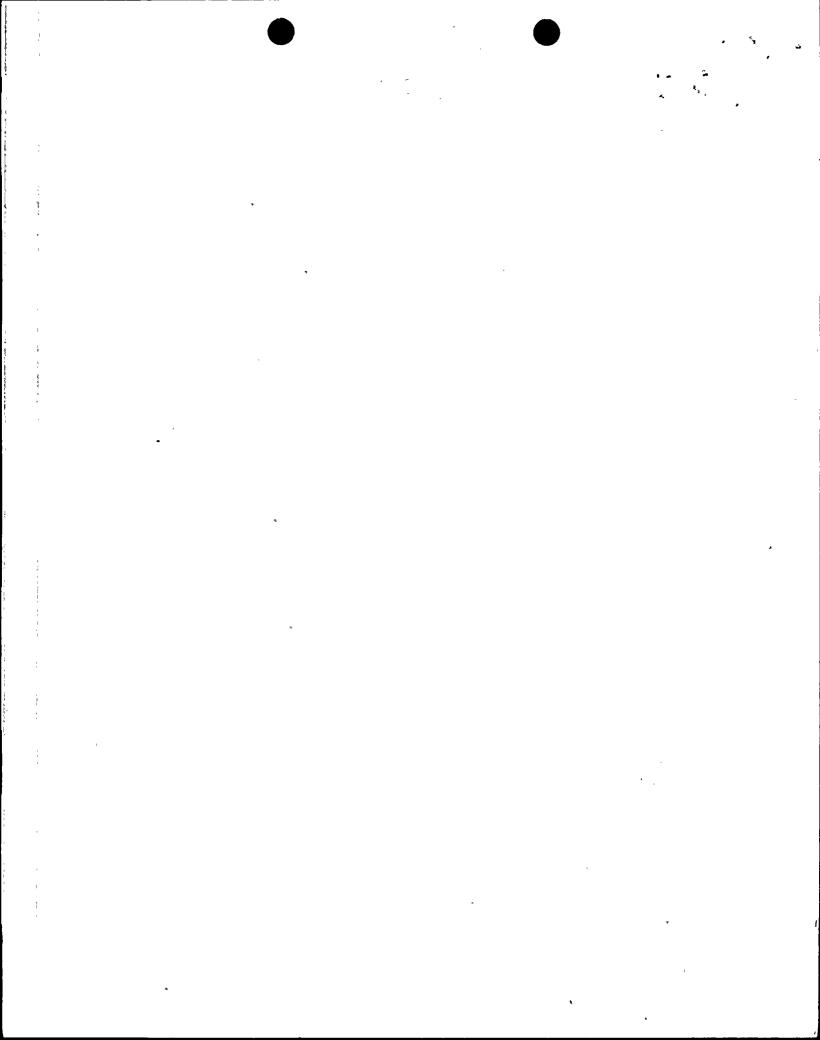
Revised Marked-Up Technical Specification Pages for the Proposed Amendment to Limiting Condition for Operation

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

A001



U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Revised TS Pages for Amendment to TS LCO 3.2.1, 3.2.4, and Associated Bases Page 2

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,

Low Count

WLS/SAB/NLT/rv Enclosure

cc: L. J.

L. J. Callan

K. E. Perkins

B. E. Holian

K. E. Johnston

A. V. Godwin (ARRA)

