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STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530

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SUBJECT: Application for amends to licenses NPF-41, NPF-51 & NPF-74, providing mutually agreed upon mods to proposed amends.

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WILLIAM L. STEWART
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-03472-WLS/AKK/KR
September 10, 1995

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

Reference: Letter No. 102-03293, dated March 24, 1995, from W. L. Stewart, Executive Vice President, Nuclear, APS to USNRC

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Modifications to the Proposed Amendment to Technical Specification
Section 3/4.8.1**

On May 31, 1995, representatives from Arizona Public Service Company (APS) met with Edward B. Tomlinson from the Nuclear Regulatory Commission, to discuss Mr. Tomlinson's comments and questions concerning the proposed amendment to Technical Specification (TS) Section 3/4.8.1, Electrical Power Systems, A.C. Sources, and the associated TS Bases for Palo Verde Units 1, 2, and 3 (Reference 1). The enclosure to this letter provides the mutually agreed upon modifications to the proposed amendment. This is a partial submittal in that only the changed pages have been included.

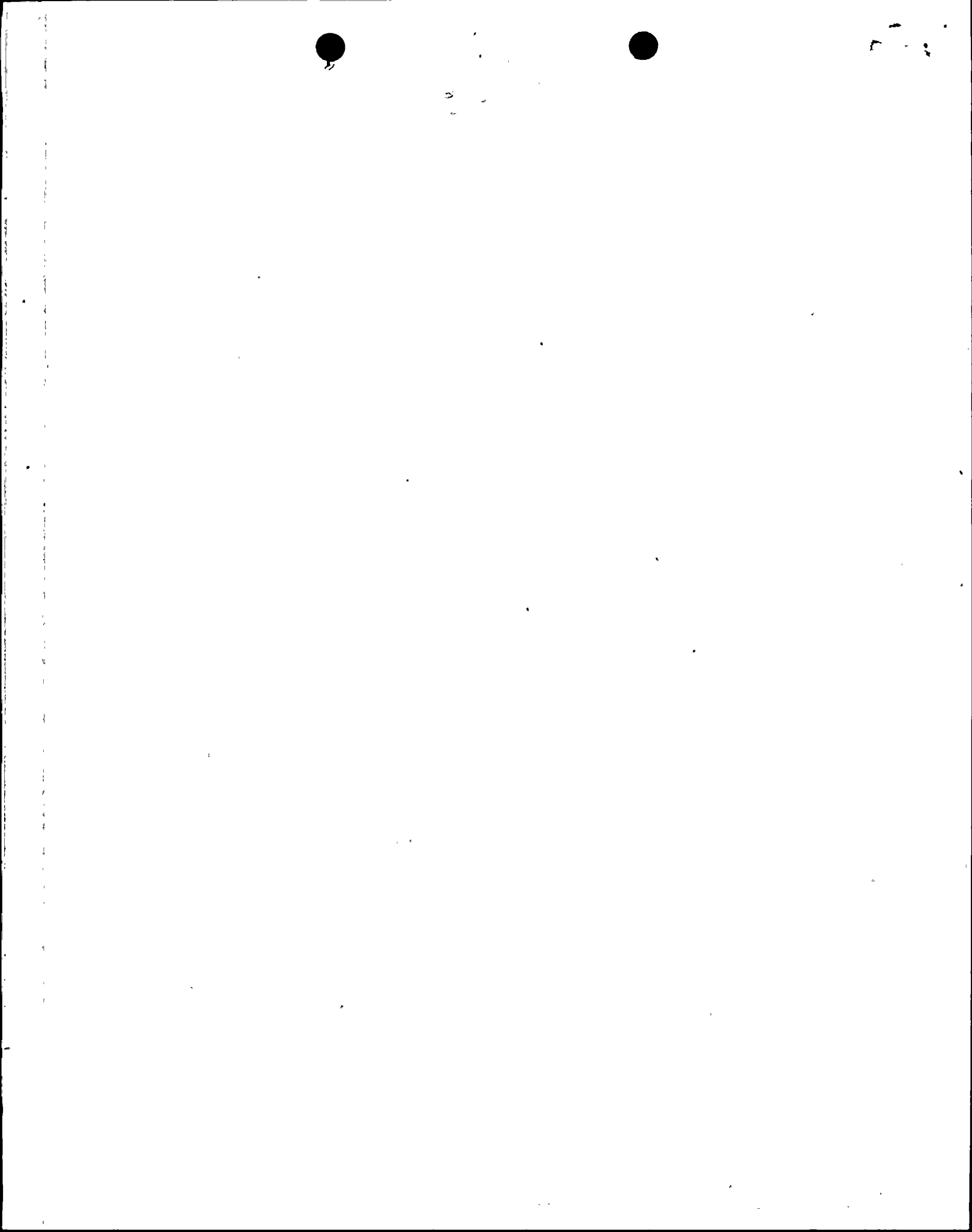
Provided in the enclosure are the following:

- A. Description of the Modifications to the Proposed Amendment to Technical Specification 3/4.8.1
- B. Marked-up Pages from the Original Submittal
- C. Revised Proposed Technical Specification Section 3/4.8.1 and Bases for 3/4.8

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Modifications to the Proposed Amendment to Technical Specification Section 3/4.8.1
Page 2

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

Sincerely,

James M. Levine for WLS

WLS/AKK/KR/pv

Enclosure

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

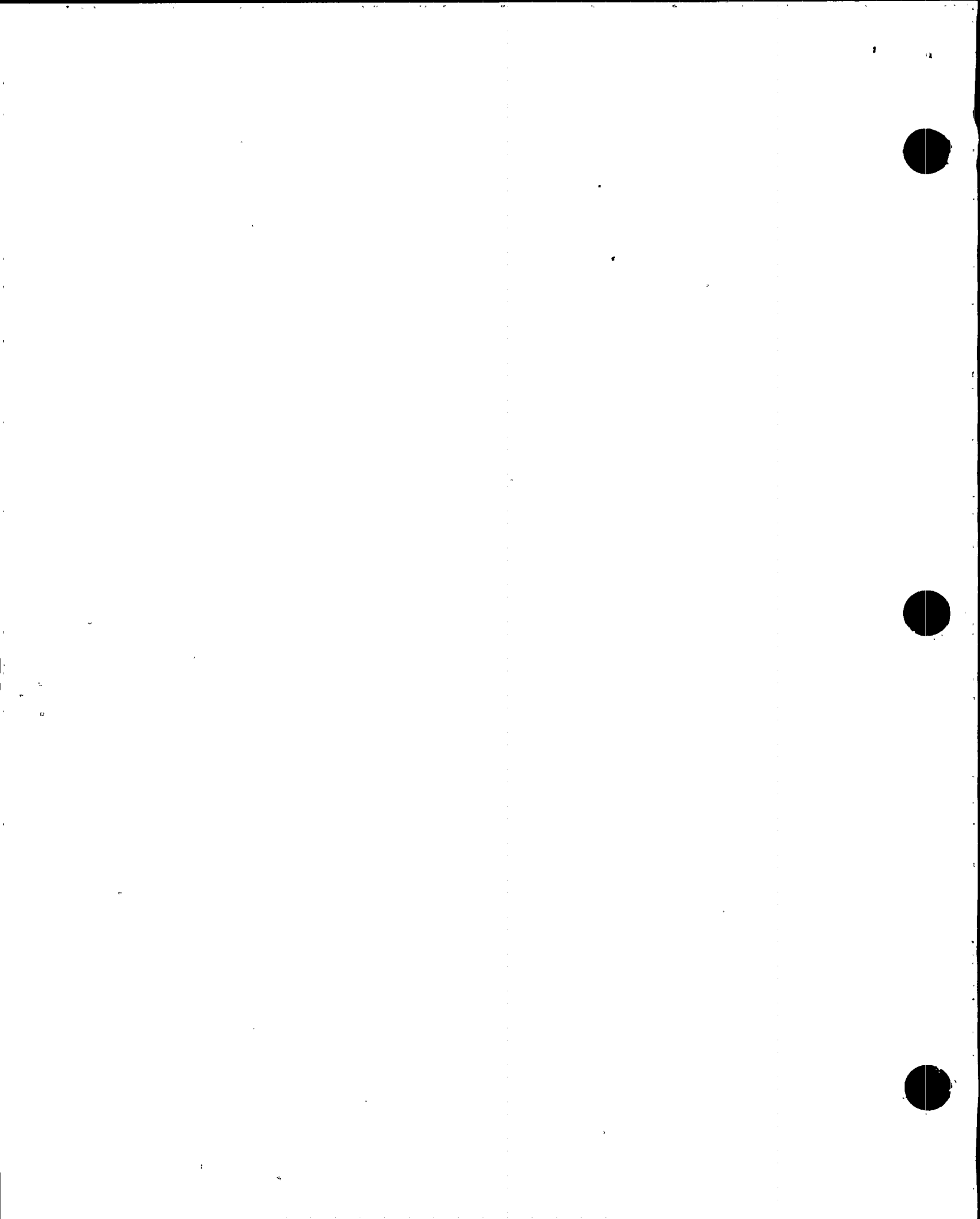
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ENCLOSURE 1

MODIFICATIONS TO THE

PROPOSED AMENDMENT TO

TECHNICAL SPECIFICATION SECTION 3/4.8.1



A. DESCRIPTION OF THE MODIFICATIONS TO THE PROPOSED AMENDMENT TO TECHNICAL SECTION 3/4.8.1

1. Section 3.8.1.1 LCO:

Pages 8, 9 and 11:

In order to be consistent with the changes made to ACTION b in Revision 1 of NUREG 1432 (Reference 2), the discussion concerning corrective maintenance and the 24 hours allowed to determine if a common mode failure exists has been deleted from the DESCRIPTION OF CHANGES and the BASES sections. The revised text from Revision 1 of NUREG 1432 has been provided for the BASES section.

2. Section 3.8.1.1 SR:

Page 2:

In order to be consistent with the change made to the Surveillance Requirement 4.8.1.1.1 to correct a typographical error and reference "indicated power availability," the same qualification is being added to the BASES section.

3. Section 3.8.1.1 SR:

Pages 5, 6, and 7:

In order to be consistent with NUREG 1432's SR 3.8.1.2 NOTE 3, a qualifying statement is being added to the SURVEILLANCE REQUIREMENT 4.8.1.1.2.a.2 footnote, DESCRIPTION OF CHANGES, and the BASES sections. The existing submittal provides for the deletion of the requirement to start and accelerate the EDG in ≤ 10 seconds (i.e., allows a slow start). However, when the slow start procedure is not used, the time, voltage, and frequency tolerances of 4.8.1.1.2.c must be met.

4. Section 3.8.1.1 SR:

Page 7:

A qualifying statement is being added to the BASES section of SR 4.8.1.1.2.a.3 so that it could not be misconstrued that additional runtime in excess of 60 minutes as recommended by the manufacturer could not be performed.

5. **Section 3.8.1.1 SR:**

Page 14:

The references to power factor not being a test condition have been deleted in the BASES sections for 4.8.1.1.2.d.1 and 4.8.1.1.2.d.2. The existing submittal takes exception to operating the EDG at a specified power factor. Therefore, since there is no requirement for power factor in the Surveillance Requirement, there is no need to mention the exception in the BASES section.

6. **Section 3.8.1.1 SR:**

Page 21:

In the existing submittal, the first footnote (*) from the existing TS is carried over in the BASES section of the proposed TS only. This footnote will be retained with the Surveillance Requirement 4.8.1.1.2.d.7 to ensure that appropriate testing is conducted in accordance with the manufacturer's recommendations regarding engine prelude, warmup, and loading procedures.

7. **Section TS 3/4.8.1.2:**

Page 2:

A section from the original BASES which applies only to TS 3.8.1.1 (A.C. SOURCES - OPERATING) was mistakenly repeated in TS 3.8.1.2 (A.C. SOURCES - SHUTDOWN). The paragraph is being deleted from the BASES for TS 3.8.1.2.

8. **Section TS 3/4.8.1.2:**

Page 5 and 6:

SR 4.8.1.1.2.d.4 has been added to the list of SR that are not applicable during shutdown (Modes 5 and 6). SR 4.8.1.1.2.d.4 (and SR 4.8.1.1.2.d.10) are not required to be met because the ESF functions (i.e., AFAS and SIAS) are not required to be OPERABLE during shutdown. The exclusion of this SR has been identified as an oversight on the part of NUREG 1432.

9. **Section TS 3/4.8.1.3:**

Page 3:

An error was found in Calculation 13-MC-DG-306, the as-built calculation for sizing the diesel fuel oil tanks. The error involved an incorrect assumption regarding the excess flow check valve leakage rates. The corrected calculation provides for a 7 day fuel oil supply of 69,656 gallons and a 6 day fuel oil supply of 60,441 gallons. The 6 day fuel oil supply has been changed from 60,200 gallons to



60,500 gallons. The 7 day fuel oil supply has been changed from 69,500 gallons to 69,700 gallons.

10. Section TS 3/4.8.1.1 BASES - SURVEILLANCE REQUIREMENTS:

The NRC reviewer was concerned about the references in the BASES section to RG 1.108 (withdrawn by the NRC on July 19, 1993) and two revisions of RG 1.9.

Contingent on NRC approval of the proposed amendment to TS 3/4.8.1, APS intends to commit to RG 1.9 Revision 3 and withdraw the commitments to RG 1.108 Revision 1 and RG 1.9 Revision 0 in Chapter 1.8 of the Updated Final Safety Analysis Report (FSAR). Clarifications and exceptions to RG 1.9 Revision 3 will also be included in the Updated FSAR Chapter 1.8.

The NRC reviewer was satisfied with this response.

Additional

References: NUREG 1432, "Standard Technical Specifications Combustion Engineering Plants," Revision 1 dated April 7, 1995.

RG 1.9, "Selection of Diesel Generator Set Capacity for Standby Power Supplies," Revision 0 dated March 10, 1971.

RG 1.9, "Selection, Design, Qualification and Testing of Emergency Diesel Generator Units Used as Class 1E Onsite Electric Power Systems at Nuclear Power Plants," Revision 3 dated July 1993.

RG 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," Revision 1 dated August 1977.



B. MARKED-UP PAGES FROM THE ORIGINAL SUBMITTAL

