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Palo Verde Nuclear **Generating Station** 

James M. Levine Senior Vice President Nuclear

TEL (602)393-5300 FAX (602)393-6077 Mail Station 7602 P.O. Box 52034 Phoenix, AZ 85072-2034

102-04007-JML/SAB/RMW September 3, 1997

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Mail Station P1-37 Washington, DC 20555-0001

Dear Sirs:

Palo Verde Nuclear Generating Station (PVNGS) Subject: Unit 2 Docket No. STN 50-529 **Request for Amendment to Technical Specification (TS) Table 4.3-2,** "Engineered Safety Features Actuation System Instrumentation Surveillance Requirements," Additional Information

Arizona Public Service Company (APS) requested an amendment to Technical Specification 4.3.2.1 for Main Steam Isolation System (MSIS) logic surveillance testing for PVNGS Unit 2 on August 28, 1997. In support of this request, APS has performed a historical review spanning the last three years of Licensee Event Reports, Condition Report/Disposition Request and Equipment Failure Data Trending for all three units' pertaining to the equipment for which this amendment is requested. This review has determined that there have been no failures of the matrix logic, initiation logic, automatic actuation logic or manual actuation that would have prevented the Engineered Safety Features Actuation System (ESFAS) MSIS from performing its design function. As such, delaying the surveillance by five days is not expected to miss identification of a condition that would result in the inability of the equipment to perform its intended function.

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

Sincerely

JML/SAB/RMW/rlh

E. W. Merschoff CC: K. E. Perkins K. M. Thomas **PVNGS Sr. Resident** A. V. Godwin (ARRA)

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