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AUTH. NAME      AUTHOR AFFILIATION  
 LEVINE, J.M.      Arizona Public Service Co. (formerly Arizona Nuclear Power  
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SUBJECT: Withdraws application for amends to PVNGS licenses re LPSI & EDG TS changes submitted in reference ltrs. No commitments are being made by this ltr.

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September 6, 1998

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- References:
1. APS Letter No. 102-03392-WLS/SAB/GAM, dated June 13, 1995, from W. L. Stewart, APS, to NRC, "Proposed Amendment to Technical Specification Sections 3.5.1, 3.5.2, 3.7.11, 3/4.8.1.1, and Bases"
  2. APS Letter No. 102-03449-AKK/SAB/GAM, dated August 16, 1995, from A. K. Krainik, APS, to NRC, "Supplement to Proposed Amendment to Technical Specification Sections 3.5.1, 3.5.2, 3.7.11, 3/4.8.1.1, and Bases"
  3. APS Letter No. 102-04132-JML/SAB/GAM, dated June 9, 1998, from J. M. Levine, APS, to NRC, Revised Improved Technical Specification (ITS) Pages for Safety Injection Tank (SIT) Amendment Request"

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. STN 50-528/529/530  
Withdrawal of Application for Amendments to Facility  
Operating Licenses Regarding the Low Pressure Safety  
Injection Subtrains and the Emergency Diesel Generators**

In Reference 1, as supplemented by Reference 2, APS requested amendments to the PVNGS operating licenses that would revise the Technical Specifications (TS) to extend the allowed outage times for the safety injection tanks (SITs), low pressure safety injection (LPSI) subtrains, and the emergency diesel generators (EDGs). The request was submitted as part of a collaborative effort of participating Combustion Engineering Owners Group (CEOG) members as a risk-informed licensing application. In Reference 3, APS provided the proposed SIT TS changes in the PVNGS Improved Technical Specification format, anticipating that the SIT changes would be approved by the NRC separately from the proposed LPSI and EDG changes.

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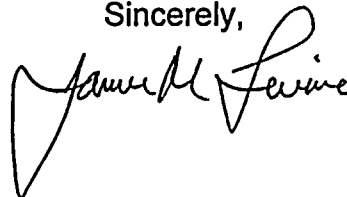
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Withdrawal of Application for Amendments to Facility Operating Licenses  
Regarding the Low Pressure Safety Injection Subtrains and the Emergency  
Diesel Generators  
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APS requests to withdraw the application for amendments to the PVNGS operating licenses for the LPSI and EDG TS changes requested in Reference 1 and supplemented by Reference 2. The NRC had previously issued a Notice of Consideration of Issuance of Amendment published in the Federal Register on October 25, 1995 (60 FR 554715). The proposed changes to extend the AOTs for the LPSI subtrains and EDGs would have been enhancements to provide additional flexibility for performing maintenance. The NRC has identified, through communications with the CEOG and with other licensees with applications for risk-informed AOT extensions, that a configuration risk management program (CRMP) would need to be added to the TS for implementation with the extended AOTs. APS has decided to withdraw the current proposed LPSI and EDG AOT extensions for resubmittal in the future along with a proposed CRMP (if the need for a CRMP is not alleviated by changes in the Maintenance Rule [10 CFR 50.65]).

No commitments are being made to the NRC by this letter.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "James M. Levine". The signature is fluid and cursive, with a large initial "J" and a distinct "L" at the end.

JML/SAB/GAM/rjh

cc: E. W. Merschoff  
M. B. Fields  
J. H. Moorman  
A. V. Godwin [ARRA]