





10 CFR 50.90
10 CFR 50.91

Palo Verde Nuclear
Generating Station

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U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

102-04224-JML/SAB/RKR
December 16, 1998

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Docket Nos. STN 50-528/529/530
Request for Amendment to Technical Specification (TS)
3.8.1, AC Sources – Operating and 3.3.7, Diesel Generator
(DG) – Loss of Voltage Start (LOVS)**

Arizona Public Service Company (APS) requests an amendment to Technical Specification 3.8.1, AC Sources – Operating and 3.3.7, Diesel Generator (DG) – Loss of Voltage Start (LOVS). The proposed amendment will change Condition G of Technical Specification 3.8.1. These changes will ensure that the appropriate actions will be taken to prevent double sequencing of safety-related loads. This change is required to assure the capability of the offsite circuits "to effect a safe shutdown and to mitigate the effects of an accident" as required by Regulatory Guide 1.93. As discussed in the September 16, 1997 meeting with the NRC staff, this Technical Specification amendment will resolve the degraded voltage issue for PVNGS. By this submittal, APS withdraws the Technical Specification amendment request dated November 6, 1996. The revised Technical Specification Bases are also provided (see enclosure 2) in order to facilitate the approval of the Technical Specification changes.

The proposed amendment will also change the setpoint allowable values for the degraded voltage and the loss of voltage relays in Technical Specification Surveillance Requirement SR 3.3.7.3. These changes will ensure that the setpoints reflect the required function of the relays. The revised Technical Specification Bases are also provided (see enclosure 2) in order to facilitate the approval of the Technical Specification changes.

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U. S. Nuclear Regulatory Commission
Request for Amendment to Technical Specifications
Page 2

Provided in enclosure 1 to this letter are the following sections which support the proposed Technical Specification amendments:

- A. Description and Safety Analysis of the Proposed Technical Specification Amendment
- B. Purpose of the Technical Specification
- C. Need for the Amendment
- D. No Significant Hazards Consideration Determination
- E. Environmental Consideration
- F. Revised Technical Specification Pages
- G. Retyped Technical Specification Pages

In the September 16, 1997 meeting with the NRC staff, APS committed to review the Updated Final Safety Analysis Report (UFSAR) to verify that it adequately describes the plant as it relates to degraded switchyard voltage and double sequencing. The review of the UFSAR identified changes that are required to ensure that the UFSAR adequately describes the plant as it relates to degraded switchyard voltage and double sequencing. These changes are also provided (see enclosure 3) in order to facilitate the approval of the Technical Specification changes.

In addition, APS committed to analyze the risk impact of the proposed administrative controls and the basis for concluding that PVNGS will be operated in accordance with the regulations with the use of administrative controls as a permanent solution to protect against double sequencing of safety related equipment. As discussed in the September 16, 1997 meeting, APS has determined that the degraded voltage relays can only be credited for undervoltage protection during steady-state conditions. When the voltage is fluctuating, such as during automatic load sequencing following an accident signal, the degraded voltage relays are incapable of anticipating a degraded condition or initiating immediate transfer to the diesel generators if the voltage from the offsite circuits would drop to a degraded level immediately following the accident signal or during sequencing. APS has not been able to identify a practical automatic device that would prevent double sequencing. Since APS cannot identify a practical automatic device to prevent double sequencing and the administrative controls protect against double sequencing of safety related equipment, APS has determined that there is no additional risk associated with the use of administrative controls. Therefore, APS concludes that the administrative controls associated with this Technical Specification change are required to protect the plant against a degraded switchyard/double sequencing condition and to ensure that the plant is operated in accordance with regulations.



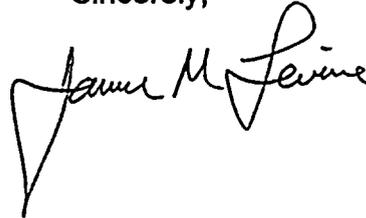
U. S. Nuclear Regulatory Commission
Request for Amendment to Technical Specifications
Page 3

In accordance with PVNGS Quality Assurance Program, the Plant Review Board and Offsite Safety Review Committee have reviewed and concurred with this proposed amendment. By copy of this letter, this request is being forwarded to the Arizona Radiation Regulatory Agency (ARRA) pursuant to 10 CFR 50.91(b)(1).

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

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

Sincerely,

A handwritten signature in cursive script, appearing to read "James M. Levine". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

JML/SAB/RKR/rjh

Enclosures

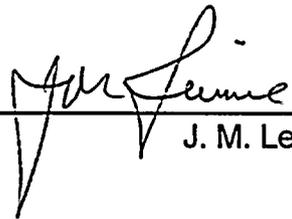
cc: E. W. Merschoff (NRC Region IV)
M. B. Fields (NRR Project Manager)
J. H. Moorman (NRC Resident Inspector)
A. V. Godwin (ARRA)

(all w/Enclosure)



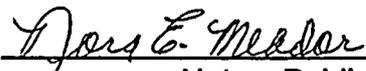
STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, J. M. Levine, represent that I am Senior Vice President - Nuclear, Arizona Public Service Company (APS), that the foregoing document has been signed by me on behalf of APS with full authority to do so, and that to the best of my knowledge and belief, the statements made therein are true and correct.



J. M. Levine

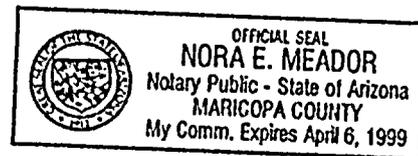
Sworn To Before Me This 16th Day Of December, 1998.



Notary Public

My Commission Expires

April 6, 1999



SECRET