



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 30 TO FACILITY OPERATING LICENSE NO. NPF-51,  
ARIZONA PUBLIC SERVICE COMPANY, ET AL.  
PALO VERDE NUCLEAR GENERATING STATION, UNIT 2  
DOCKET NO. STN 50-529

1.0 INTRODUCTION

By letter dated October 13, 1989 the Arizona Public Service Company (APS) on behalf of itself, the Salt River Project Agricultural Improvement and Power District, Southern California Edison Company, El Paso Electric Company, Public Service Company of New Mexico, Los Angeles Department of Water and Power, and Southern California Public Power Authority (licensees), requested changes to the Technical Specifications for Palo Verde Nuclear Generating Station, Unit 2 (Appendix A to Facility Operating License No. NPF-51). The proposed changes would postpone, until the second refueling outage, the performance of the following 18-month surveillance tests which cannot be performed at power: 1) Diesel Generator and Integrated Safeguards test, 2) Station Battery Surveillance Test, and 3) Molded Case Circuit Breaker Surveillance Test. By letter dated December 19, 1989, the licensees withdrew their request with respect to Molded Case Circuit Breaker Surveillance Tests. The Cycle 3 refueling outage is tentatively scheduled for February, 1990.

2.0 DISCUSSION AND EVALUATION

The purpose of periodic surveillance testing is to verify the correct operation and operability of components and systems. Certain surveillance tests are specified to be performed on an 18-month cycle based upon the fact that Palo Verde utilizes an 18-month fuel cycle core, and on the recognition that certain surveillance tests can only be performed while the reactor is in either Modes 5 or 6.

Specification 4.0.2 of the Technical Specifications (TS) permits surveillance intervals to be extended up to 25 percent of the specified interval. This extension facilitates the scheduling of surveillance activities and allows surveillances to be postponed when plant conditions are not suitable for conducting a surveillance. Specification 4.0.2 also limits extending surveillances so that the combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval. The intent of the 3.25 limit is to preclude routine use of the provision for extending a surveillance interval by 25 percent.

In the case of Palo Verde Unit 2, the licensee is in essence, seeking NRC approved of an extension of greater than 25 percent of the specified interval for the following:

1. Class 1E Diesel Generator and Integrated Safeguards Surveillance Tests. The affected Technical Specification (TS) Surveillance Requirements are: 4.3.2.3, "Engineered Safety Features Actuation System Instrumentation," 4.4.3.1.3, "Pressurizer," 4.5.1.d.2, "Safety Injection Tanks," 4.5.2.e.1 through 4.5.2.e.3, "Emergency Core Cooling System Subsystems," 4.6.2.1.d, "Containment Spray System," 4.6.2.2.d, "Iodine Removal System," 4.6.3.2.a, "Containment Isolation Valves," 4.7.1.2.b, "Auxiliary Feedwater System," 4.7.3.b and 4.7.3.c, "Essential Cooling Water System," 4.7.7.d.2, "Control Room Essential Filtration System," 4.7.8.d.2, "ESF Pump Room Air Exhaust Cleanup System," and 4.8.11.2.d.2, "AC Sources."
2. Station Battery Surveillance Test. The affected TS Surveillance Requirement is 4.8.2.1.d, "DC Sources."

The proposed amendment relates to 18-month surveillance requirements that must be performed during plant shutdown and are scheduled to be performed during the second refueling outage. The schedule for the second refueling outage was delayed from September 15, 1989 to February 14, 1990, due to an unplanned outage that extended from March 15, 1989 to June 30, 1989 to address concerns that arose as a result of events at Units 1 and 3. The expiration of the 18-month interval with the 25 percent extension would occur on December 24, 1989. Consequently, compliance with the 18-month interval would require that the plant be shut down for the sole purpose of performing these required surveillance tests. As recognized in Generic Letter 89-14, the safety benefits of a plant shutdown solely to perform surveillance tests is outweighed by the increased risks associated with an unnecessary transient.

Based upon our review, we conclude that extension of the 18-month surveillance interval for the above mentioned surveillance tests until the second refueling outage for Unit 2, may be permitted.

### 3.0 EXIGENT CIRCUMSTANCES

This amendment is being issued before the expiration of the notice period to preclude an unnecessary plant shutdown. Due to administrative oversight by the NRC staff, the proposed amendment was not noticed in the Federal Register with sufficient time to permit the usual 30 day period for public comment. This administrative oversight has resulted in the need for immediate action and caused the exigent circumstances.

The Commission has determined that exigent circumstances exist in that swift action is necessary to avoid a plant shutdown not related to safety and finds that for the reason stated above, exigent circumstances exist. With this consideration in mind, it has been determined that a circumstance has arisen where the Commission must act quickly, and the licensee has made a good effort to make a timely application.

#### 4.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards considerations if operation of the facility in accordance with the amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The staff has confirmed the basis of the no significant hazards findings described in the notice published in the Federal Register on December 13, 1989 (54 FR 51253). The amendment would allow a one-time extension for certain 18-month surveillance tests beyond the 25 percent increase in nominal interval currently permitted by the Technical Specifications. The operation of the facility will not differ from that where the specified surveillances are performed within the prescribed interval. All of the postulated accidents previously analyzed remain applicable as well as their results. All operability requirements will continue to be enforced. Therefore, we conclude that:

- (1) Operation of the facility in accordance with the amendment will not significantly increase the probability or consequences of an accident previously evaluated,
- (2) Operation of the facility in accordance with the amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated, and
- (3) Operation of the facility in accordance with the amendment will not involve a significant reduction in a margin of safety.

Accordingly, we conclude that the amendment to Facility Operating License NPF-51 to support continued operation of Palo Verde Unit 2 until its second refueling outage involves no significant hazards considerations.

#### 5.0 CONTACT WITH STATE OFFICIAL

The Arizona Radiation Regulatory Agency has been advised of our final determination of no significant hazards consideration with regard to these changes. No comments were received.

#### 6.0 ENVIRONMENTAL CONSIDERATION

The amendment involves changes to surveillance requirements of facility components located within the restricted area as defined in 10 CFR 20. The staff has determined that the amendment involves no significant

increase in the amount, and no significant change in the type of any effluent that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has made a final no significant hazards finding with respect to this amendment. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need to be prepared in connection with the issuance of the amendment.

#### 7.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public. We, therefore, conclude that the proposed changes are acceptable.

Principal contributor: T. Chan

Dated: December 22, 1989