about the issue of no significant hazards consideration, which is presented below:

Standard 1 -- Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed Technical Specification amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The Technical Specification amendment provides the option to use generic shape annealing matrix elements in the Core Protection Calculators. The design basis of the Core Protection Calculators is to provide the DNBR [departure from nucleate boiling ratio] and linear heat rate trip functions for the Reactor Protection System so that the Specified Acceptable Fuel Design Limits on DNBR and fuel centerline melt are not exceeded during normal operation or Anticipated Operational Occurrences, and assist the Engineered Safety Features Actuation System in limiting the consequences of postulated accidents. The generic shape annealing matrix elements will be validated during startup testing and will meet the same acceptance criteria as the cycle specific shape annealing matrix elements. If the generic shape annealing matrix elements are not valid, cycle specific shape annealing matrix elements would be used in the Core Protection Calculators. This change will not affect the Core Protection Calculators capability to protect the plant by tripping the reactor, based on a conservative calculation of minimum DNBR and peak linear heat rate, to ensure that the Specified Acceptable Fuel Design Limits are not violated in the event of an Anticipated Operational Occurrence. Therefore, the generic shape annealing matrix elements will not affect the safety analysis, since there is no change to the design basis of the Core Protection Calculator System.

Standard 2 -- Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed Technical Specification amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. Since the generic shape annealing matrix elements will still have to meet the same acceptance criteria as the cycle specific shape annealing matrix elements, the Core Protection Calculators will still generate axial power shapes that fall within the required uncertainties. The Core Protection Calculators will still trip the reactor, based on a conservative calculation of minimum DNBR and peak linear heat rate, to ensure that the Specified Acceptable Fuel Design Limits are not violated in the event of an Anticipated Operational Occurrence.

Standard 3 -- Does the proposed change involve a significant reduction in a margin of safety?

The proposed Technical Specification amendment will not involve a significant reduction in a margin of safety. There is no reduction in the margin of safety, since the generic shape annealing matrix elements will still have to meet the same acceptance criteria as the cycle specific shape annealing matrix elements. Therefore, this change will not affect the design basis of the Core Protection Calculators. The Core Protection Calculators will still provide a reactor trip based on a conservative calculation of minimum DNBR and peak linear heat rate.

The NRC staff has reviewed the licensees' analysis and, based on that review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment requests involve no significant hazards consideration.

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## Arizona Public Service Company, et al., Docket No. STN 50-529, Palo Verde Nuclear Generating Station, Unit No. 2, Maricopa County, Arizona

*Date of amendment request:* November 30, 1994

Description of amendment request: The proposed amendment would change the pressurizer code safety valve lift setting from 2500 psia to 2475 psia. The lift setting is being changed to permit Unit 2 to operate with up to 1500 plugged tubes in each steam generator.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensees have provided their analysis about the issue of no significant hazards consideration, which is presented below:

Standard 1 -- Does the proposed change involve a significant increase in the probability or consequence of an accident previously evaluated?

The proposed Technical Specification amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. Chapters 6 and 15 of the [Palo Verde Nuclear Generating Station] PVNGS [Updated Final Safety Analysis Report] UFSAR have been reviewed to address the impact of these changes (1500 plugged tubes and a pressurizer code safety valve nominal lift setpoint of 2475 psia) on accident consequences. For most of the events that were previously analyzed in the UFSAR, the proposed change does not have a significant affect or adversely impact the accident analysis. For RCS [reactor coolant system] pressure peaking events, Loss of Condenser Vacuum (LOCV) and Feedwater Line Breaks (FLB), a new analysis was performed to justify the acceptability of the changes.

For the LOCV event (anticipated operational occurrence), the reanalysis determined that the peak RCS pressure, assuming 1500 plugged tubes and a pressurizer code safety valve nominal lift setpoint of 2475 psia, is 2728 psia. The maximum reactor coolant system (RCS) pressure reached for this event as described in UFSAR Section 15.2.3 is 2742 psia. Therefore, this change is bounded by the reference cycle (UFSAR analysis) and remains below the 110% (2750 psia) design pressure limit.

Several FLB scenarios are analyzed in support of PVNGS Unit 2 operation. The scenario with the highest system pressures is the large FLB with a loss of alternating current (LOAC). For the large FLB with a LOAC event (limiting fault event), assuming 1500 plugged tubes and a pressurizer code safety valve nominal lift setpoint of 2475 psia, is 2813 psia. The maximum RCS pressure reached for this event as described in UFSAR Section 15.2.8 is 2843 psia. The analysis shows that the RCS peak pressure for the large FLB with a LOAC (very low probability) event remains below the required value of 120% (3000 psia) of design pressure. Therefore, the analyses and reviews of the RCS pressure peaking events determined that the UFSAR design pressure limit is still bounding with this change. That is, the RCS design pressure limit will not be exceeded. Also, safety valves are accident mitigating devices and do not contribute to the probability of an event.

Standard 2 -- Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed Technical Specification amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The analyses and reviews show that the current licensing basis remains valid for this change (UFSAR design pressure limit is still bounding with this change). Safety valves are accident mitigating devices and do not contribute to the possibility of an accident. The pressurizer code safety valves are not manually or remotely operated, but are designed to automatically open to provide overpressure protection for pressure peaking events. The change in the pressurizer code safety valve setpoint to 2475 psia does not significantly increase the probability of a pressurizer code safety valve opening, since the pressure is still well above the Technical Specification Table 2.2-1 reactor trip setpoint of 2383 psia for high pressurizer pressure.

Standard 3 -- Does the proposed change involve a significant reduction in a margin of safety?

The proposed Technical Specification amendment does not involve a significant reduction in a margin of safety. The analyses and reviews show that the limits in the licensing and design basis are still valid with this change. The analyses show that the RCS peak pressure remains below the 110% (2750 psia) design pressure limit for the LOCV event and remains below the required value of 120% (3000 psia) of design pressure RCS peak pressure for the large FLB with a LOAC (very low probability) event. The analyses