

regulatory requirements and the associated surveillance program ensure that the reactor building tendon prestressing system is capable of maintaining the structural integrity of the containment during operating and accident conditions. The reactor building prestressing system is not an initiator of any accident. Therefore, this change is not related to the probability of any accident previously evaluated. This change ensures that the containment tendon surveillance program addresses the appropriate regulatory criteria. This change does not result in any reduction in the effectiveness of the existing surveillance program. The tendon surveillance program will continue to ensure that the containment structure is capable of performing its intended safety function in the event of a design basis accident. Therefore, this change has no effect on the consequences of an accident previously evaluated.

The proposed changes to Technical Specification Definition 1.22, Technical Specification 3.1.6.6 and associated Bases, and Technical Specification 3.24 Bases are only administrative changes or corrections and have no effect on plant design or operations. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

*Response:* No.

The proposed revision to Technical Specification 4.4.2.1 and associated Bases Section incorporates references to the criteria of 10 CFR 50.55a, "Codes and standards," in addition to the existing criteria of Regulatory Guide 1.35. This change provides consistency between the Technical Specification tendon surveillance program criteria and the regulatory requirement specified in 10 CFR 50.55a(b)(2)(vi). The proposed Technical Specification change does not result in any reduction in effectiveness of the existing tendon surveillance program. The tendon surveillance program will continue to satisfy the applicable Technical Specification and regulatory required criteria, thus ensuring that the containment structure will perform its design safety function. This change has no effect on the design and operation of plant structures, systems, and components. This change does not introduce any new accident precursors and does not involve any alterations to plant configurations, which could initiate a new or different kind of accident.

The proposed changes to Technical Specification Definition 1.22, Technical Specification 3.1.6.6 and associated Bases, and Technical Specification 3.24 Bases are only administrative changes or corrections and have no effect on plant design or operations.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

*Response:* No.

The proposed revision to Technical Specification 4.4.2.1 and associated Bases Section incorporates reference to the criteria of 10 CFR 50.55a, "Codes and standards," in addition to the existing criteria of Regulatory Guide 1.35. This change provides consistency between the Technical Specification tendon surveillance program criteria and the regulatory requirement specified in 10 CFR 50.55a(b)(2)(vi). The containment examination and inspection requirements specified in 10 CFR 50.55a(b)(2)(vi) meet the same standards as the criteria specified in Regulatory Guide 1.35. The proposed Technical Specification change does not result in any reduction in effectiveness of the existing tendon surveillance program. The tendon surveillance program will continue to satisfy the applicable Technical Specification and regulatory required criteria, thus ensuring that the containment structure will perform its design safety function in accordance with existing margins of safety for containment integrity.

The proposed changes to Technical Specification Definition 1.22, Technical Specification 3.1.6.6 and associated Bases, and Technical Specification 3.24 Bases are only administrative changes or corrections and have no effect on plant design or operations.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration. *Attorney for licensee:* Edward J. Cullen, Jr., Esquire, Vice President, General Counsel and Secretary, Exelon Generation Company, LLC, 300 Exelon Way, Kennett Square, PA 19348 *NRC Section Chief:* Richard J. Laufer.

*Arizona Public Service Company, et al., Docket Nos. STN 50-528, STN 50-529, and STN 50-530, Palo Verde Nuclear Generating Station, Units 1, 2, and 3, Maricopa County, Arizona*

*Date of amendments request:* August 22, 2003.

*Description of amendments request:* The amendments would revise three different sections in the Updated Final Safety Analysis Report (UFSAR) for PVNGS [Palo Verde Nuclear Generating Station], Units 1, 2, and 3. This request would revise the sections of the UFSAR which describe the maximum fuel pin pressurization criteria used for fuel handling accident safety analyses. This change is necessitated due to the combination of higher core burnup designs, fuel which contains erbia poison, and the recent introduction of

ZIRLO clad fuel to the PVNGS reactors.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change would revise sections of the PVNGS UFSAR, which describe the maximum fuel pin pressurization criteria used for fuel handling accident safety analyses.

No additional equipment is being added as a result of the proposed change. None of the failure modes and effects analyses are impacted by the proposed change since no structures, systems, or components (SSCs) are being modified, system lineups remain the same, and operator actions for fuel handling accident are not changing. No manual actions are being substituted for automatic actions. The SSCs relied upon to mitigate the event are not changing. Specifically, the fuel building, BOPESFAS (Balance of Plant-Engineered Safety Features Actuation System), radiation monitor setpoints, etc. are not impacted. The methodology changes will have no impact on the likelihood of a malfunction of any SSCs.

No departures from the design or testing and performance standards outlined in any 10 CFR [Part] 50, Appendix A, General Design Criteria (GDC) will result from the proposed activity. The proposed UFSAR changes will not make any SSCs more likely to fail (no direct effects). Even with higher fuel pin pressures, the use of ZIRLO cladding provides more margin to design stress limits (liftoff pressure) than Zircaloy cladding. Regardless of the fuel type (and hence cladding type), the design stress and code allowable limits will not be exceeded. Palo Verde Nuclear Generating Station (PVNGS) "Fuel Mishandling Accident Evaluation with ZIRLO Fuel Rods" concluded that the analysis of record for fuel handling events involving fuel assemblies containing ZIRLO cladding would remain bounding. No physical changes to any SSCs will be performed as a result of the proposed changes. In addition, system/equipment redundancy requirements are maintained with the proposed UFSAR changes.

Fuel handling accident analyses must ensure doses at the site boundary and control room remains well within 10 CFR Part 100 and 10 CFR [Part] 50 Appendix A, GDC 19 exposure guideline. Restricting the peak assembly average fuel pin pressure to <1200 psig will still result in acceptable doses. Therefore, no indirect effects on SSCs associated with dose limitations are impacted.

Consequences mean dose at the Exclusion Area Boundary (EAB), Low Population Zone (LPZ), and Control Room; therefore, an increase in consequences must involve an increase in radiological doses to the public or to control room operators. No changes to the