

June 2, 2005

Mr. Gregg R. Overbeck
Senior Vice President, Nuclear
Arizona Public Service Company
P. O. Box 52034
Phoenix, AZ 85072-0234

SUBJECT: PALO VERDE NUCLEAR GENERATING STATION UNITS 1, 2, AND 3 -
REQUEST FOR ADDITIONAL INFORMATION (RAI) RELATED TO GENERIC
LETTER 2004-02, "POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON
EMERGENCY SUMP RECIRCULATION AT PRESSURIZED-WATER
REACTORS" (TAC NOS. MC4702, MC4703, AND MC4704)

Dear Mr. Overbeck:

By letter dated March 4, 2005, Arizona Public Service Company (the licensee) provided the 90-day response to U. S. Nuclear Regulatory Commission (NRC) Generic Letter (GL) 2004-02 for Palo Verde Nuclear Generating Station, Units 1, 2, and 3. The GL requested the licensee perform an evaluation of the emergency core cooling system and containment spray system recirculation functions in light of the information provided in the GL and, if appropriate, take additional actions to ensure system function. Additionally, addressees were requested to submit to the NRC the information specified in the GL.

The NRC staff has completed its preliminary review of your response and has determined it needs additional information requested in the enclosure to complete our review.

This RAI requests additional information about your overall plans and schedules and not any information on detailed plans or extensive analyses. In light of this, please provide the additional information requested in the enclosure within 45 days of receipt of this letter.

If you have any questions, please call me at (301) 415-3062.

Sincerely,
/RA/

Mel B. Fields, Senior Project Manager, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-528, STN 50-529,
and STN 50-530

Enclosure: Request for Additional Information

cc w/encl: See next page

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Palo Verde Generating Station, Units 1, 2, and 3

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REQUEST FOR ADDITIONAL INFORMATION
REGARDING GENERIC LETTER 2004-02,
“POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON
EMERGENCY SUMP RECIRCULATION AT PRESSURIZED-WATER REACTORS”
ARIZONA PUBLIC SERVICE COMPANY
PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3
DOCKET NOS. STN 50-528, STN 50-529, AND STN 50-530

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In your 90-day response to GL 2004-02, you indicated that you intend to use future test results, industry guidance, and NRC guidance to account for chemical precipitants in your evaluation and their availability will impact the schedule for performing an evaluation. The cooperative NRC-Electric Power Research Institute tests in progress at the University of New Mexico are designed to determine if chemical effects occur, but are not designed to measure head loss associated with any chemical effects. The staff notes that some chemical effects have been observed in the initial three tests.

In your 90-day response to GL 2004-02, you also indicated that you intend to use industry owners' group guidance and component manufacturer data to evaluate long-term performance degradation of downstream susceptible components caused by debris-laden fluid and their availability will impact the schedule for performing an evaluation.

For both of these issues, you stated the evaluation may occur after the September 1, 2005, response due date, depending on the schedule for testing and the availability of industry guidance. This is contrary to the information request in GL 2004-02, which requests that chemical and downstream effects be addressed in the September 1, 2005, response. This delay is also contrary to the staff's position that there are sufficient bases to address sump vulnerability to chemical effects and that the September response will be incomplete if the evaluation is incomplete, the design is not complete, or there is no schedule for upgrades. In this light, please discuss your plans and schedule for evaluating chemical effects and the long-term downstream effects. In addition, please discuss any plans for performing testing to support your evaluation of these effects.

ENCLOSURE