



EA-12-051

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102-06759-DCM/MAM/TLC  
August 28, 2013

U.S. Nuclear Regulatory Commission  
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- References:
1. NRC Order Number EA-12-051, *Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Level Instrumentation*, dated March 12, 2012
  2. APS Letter 102-06613, *Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Level Instrumentation (Order Number EA-12-051)*, dated October 29, 2012
  3. APS Letter 102-06669, *APS Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Level Instrumentation (Order Number EA-12-051)*, dated February 28, 2013
  4. APS Letter 102-06728, *Response to Request for Additional Information for the PVNGS Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Level Instrumentation (Order Number EA-12-051)*, dated July 11, 2013

Dear Sirs:

Subject: **Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. STN 50-528, 50-529, and 50-530  
APS First 6-Month Status Report on the PVNGS Overall  
Integrated Plan in Response to March 12, 2012 Commission  
Order Modifying Licenses with Regard to Reliable Spent Fuel  
Pool Level Instrumentation (Order Number EA-12-051)**

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to Arizona Public Service Company (APS). Reference 1 was immediately effective and directs that PVNGS must have a reliable means of remotely monitoring wide-range spent fuel pool (SFP) levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-

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APS First 6-Month Status Report on the PVNGS Overall Integrated Plan for Reliable  
Spent Fuel Pool Level Instrumentation  
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design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance and an overall integrated plan (OIP) pursuant to Section IV, Condition C. Reference 2 provided the APS initial status report regarding reliable SFP level instrumentation. In Reference 3, APS provided the PVNGS OIP.

After reviewing the PVNGS OIP for SFP level instrumentation, the NRC issued a request for additional information (RAI) to APS. On July 11, 2013, APS provided a response to the NRC RAI regarding the PVNGS OIP for SFP level instrumentation (Reference 3).

Reference 1 also requires submission of a status report at 6-month intervals following submittal of the OIP. NEI 12-02, *Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,"* Revision 1, provides direction regarding the content of the status reports. The enclosure to this letter provides the first 6-month status report on the PVNGS OIP for SFP level instrumentation pursuant to Section IV, Condition C.2, of Reference 1.

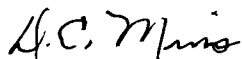
No commitments are being made to the NRC by this letter.

Should you have any questions concerning the content of this letter, please contact Mark McGhee, Department Leader, Regulatory Affairs, at (623) 393-4972.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8/28/13  
(Date)

Sincerely,



Enclosure: APS First 6-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool (SFP) Instrumentation

DCM/MAM/TLC/hsc

cc:	E. J. Leeds	NRC Director Office of Nuclear Reactor Regulation
	S. A. Reynolds	NRC Region IV Regional Administrator
	J. K. Rankin	NRC NRR Project Manager
	J. P. Reynoso	NRC Senior Resident Inspector for PVNGS
	L. M. Regner	NRR/JLD/PMB, NRC

**ENCLOSURE**

**APS First 6-Month Status Report for the Implementation  
of Order EA-12-051, Order Modifying Licenses with  
Regard to Requirements for Reliable Spent Fuel Pool  
(SFP) Instrumentation**

**APS First 6-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Requirements for Reliable SFP Instrumentation**

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## 1 Introduction

APS developed an Overall Integrated Plan (OIP) (Reference 2 in Section 8), documenting the requirements to install reliable spend fuel pool level instrumentation (SFP LI), in response to Reference 1. This enclosure provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief or relaxation and the basis, if any.

## 2 Milestone Accomplishments

The following milestone(s) have been completed since the development of the OIP, and are current as of July 31, 2013.

- Engineering and design work for Units 1, 2, and 3 have been started. Design work is ongoing and scheduled for completion in the fourth quarter of 2013 (see the Section 3 Milestone Schedule Status Table).

## 3 Milestone Schedule Status

The following provides an update to the milestone schedule in support of the OIP. This section provides the activity status of each item and whether the expected completion date has changed. The provided dates are for planning purposes and subject to change as design and implementation details are developed. Additional changes in target completion dates will be noted in future 6-month status reports.

<b>Milestone</b>	<b>Target Completion Date</b>	<b>Activity Status</b>	<b>Revised Target Completion Date</b>
Submit 60 Day Status Report	Oct 2012	Complete	
Submit Overall Integrated Plan	Feb 2013	Complete	
<b>Submit 6 Month Updates:</b>			
Update 1	Aug 2013	Complete	
Update 2	Feb 2014	Not Started	
Update 3	Aug 2014	Not Started	
Update 4	Feb 2015	Not Started	
Update 5	Aug 2015	Not Started	
Update 6	Feb 2016	Not Started	
Update 7	Aug 2016	Not Started	
<b>Modifications:</b>			
Modifications Evaluation	Feb 2013	Complete	
Units 1, 2, and 3 Engineering and Design Work	4Q2013	Started	

**APS First 6-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Requirements for Reliable SFP Instrumentation**

Receipt of Unit 1 SFP Instruments	2Q2014	Not Started	
Receipt of Unit 2 SFP Instruments	2Q2015	Not Started	
Receipt of Unit 3 SFP Instruments	4Q2014	Not Started	
Unit 1 Implementation Outage	Fall 2014	Not Started	
Unit 2 Implementation Outage	Fall 2015	Not Started	
Unit 3 Implementation Outage	Spring 2015	Not Started	
<b>Procedures:</b>			
Create Procedures <sup>1</sup>	Oct 2014	Started	
<b>Training:</b>			
Develop Training Plan	Apr 2014	Not Started	
Complete Unit 1 SFP Instruments Procedures & Training	3Q2014	Not Started	
Complete Unit 2 SFP Instruments Procedures & Training	3Q2015	Not Started	
Complete Unit 3 SFP Instruments Procedures & Training	1Q2015	Not Started	
Unit 1 SFP Instruments Operational	Nov 2014 <sup>2</sup>	Not Started	
Unit 2 SFP Instruments Operational	Nov 2015 <sup>2</sup>	Not Started	
Unit 3 SFP Instruments Operational	May 2015 <sup>2</sup>	Not Started	
Full Site SFP LI Implementation	Dec 2015	Not Started	
Submit Completion Report	Apr 2016	Not Started	

<sup>1</sup> Includes maintenance procedures

<sup>2</sup> Implementation for Unit 1 is prior to startup from 1R18 (Fall 2014), Unit 2 is prior to startup from 2R19 (Fall 2015), and Unit 3 is prior to startup from 3R18 (Spring 2015).

#### **4 Changes to Compliance Method**

There are no changes to the compliance method as documented in the Overall Integrated Plan.

#### **5 Need for Relief/Relaxation and Basis for the Relief/Relaxation**

APS expects to comply with the order implementation date and no relief or relaxation is requested at this time.

#### **6 Open Items from Overall Integrated Plan and Draft Safety Evaluation**

The following tables provide a summary of the open items documented in the Overall Integrated Plan or the Draft Safety Evaluation (SE) and the status of each item.

**APS First 6-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Requirements for Reliable SFP Instrumentation**

Overall Integrated Plan Open Item	Status
OI1- Reference 1, Section VII, <i>Arrangement</i> , finalize primary and backup system probe locations for all three SFPs.	Started  Probe locations have not been finalized. Detailed engineering and design work is ongoing with expected completion in 4Q2013.

Draft Safety Evaluation Open Item <sup>1</sup>	Status
None	-

<sup>1</sup> A Safety Evaluation has not been received from the NRC.

## 7 Potential Draft Safety Evaluation Impacts

There are no potential impacts to the Draft Safety Evaluation identified at this time.

## 8 References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

1. NRC Order Number EA-12-051, *Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Level Instrumentation*, dated March 12, 2012.
2. APS Letter 102-06669, *APS Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Level Instrumentation (Order Number EA-12-051)*, dated February 28, 2013.
3. APS Letter 102-06728, *Response to Request for Additional Information for the PVNGS Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Level Instrumentation (Order Number EA-12-051)*, dated July 11, 2013.
4. NEI 12-02, *Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,"* Revision 1, dated August 2012