

February 14, 2000

Mr. Gregg R. Overbeck
Senior Vice President, Nuclear
Arizona Public Service Company
P. O. Box 52034
Phoenix, AZ 85072-2034

SUBJECT: PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3 -
CLOSEOUT OF GENERIC LETTER 99-02 (TAC NOS. MA5824, MA5825, AND
MA5826)

Dear Mr. Overbeck:

On June 3, 1999, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear-grade Activated Charcoal," to all holders of operating licenses for nuclear power reactors, except those who have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel.

The purpose of the GL was to:

- (1) Alert addressees that the NRC has determined that testing nuclear-grade activated charcoal to standards other than American Society for Testing and Materials (ASTM) D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon," does not provide assurance for complying with the current licensing basis as it relates to the dose limits of General Design Criterion (GDC) 19 of Appendix A to Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR) and Subpart A of 10 CFR Part 100.
- (2) Request that all addressees determine whether their Technical Specifications (TS) reference ASTM D3803-1989 for charcoal filter laboratory testing. Addressees whose TS do not reference ASTM D3803-1989 should either amend their TS to reference ASTM D3803-1989 or propose an alternative test protocol and provide the information discussed in the requested actions.
- (3) Alert addressees to the staff's intent to exercise enforcement discretion under certain conditions.
- (4) Request that all addressees send the NRC written responses on the implementation of the actions requested in this GL.

In GL 99-02, the NRC staff established the following four groups of plants:

- (1) plants in compliance with their TS that test in accordance with ASTM D3803-1989

- (2) plants in compliance with their TS that test in accordance with a test protocol other than ASTM D3803-1989
- (3) plants not in compliance with their TS that test in accordance with ASTM D3803-1989
- (4) plants not in compliance with their TS that test in accordance with a test protocol other than ASTM D3803-1989

In response to GL 99-02, you provided a letter dated November 19, 1999, for the Palo Verde Nuclear Generating Station, Units 1, 2, and 3. In this letter you stated that the Palo Verde units were in compliance with their TS, but were using a test protocol other than ASTM D3803-1989. Associated with your response was a request for a license amendment to change your TS to provide for testing as described in the GL. The NRC staff has reviewed your response and has concluded that you have provided the requested information and a TS change request in accordance with the GL. In addition, you state that Palo Verde already performs testing in accordance with ASTM D3803-1989 for purposes of performance monitoring. Therefore, we consider GL 99-02 to be closed for your facilities. The TS change will be reviewed as a separate, plant-specific action under TAC Nos. MA7743, MA7744, and MA7745. We thank you for your prompt and complete response.

If you have any questions regarding this matter, please contact me at (301)415-3062.

Sincerely,

/RA/

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

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

cc: See next page

- (2) plants in compliance with their TS that test in accordance with a test protocol other than ASTM D3803-1989
- (3) plants not in compliance with their TS that test in accordance with ASTM D3803-1989
- (4) plants not in compliance with their TS that test in accordance with a test protocol other than ASTM D3803-1989

In response to GL 99-02, you provided a letter dated November 19, 1999, for the Palo Verde Nuclear Generating Station, Units 1, 2, and 3. In this letter you stated that the Palo Verde units were in compliance with their TS, but were using a test protocol other than ASTM D3803-1989. Associated with your response was a request for a license amendment to change your TS to provide for testing as described in the GL. The NRC staff has reviewed your response and has concluded that you have provided the requested information and a TS change request in accordance with the GL. In addition, you state that Palo Verde already performs testing in accordance with ASTM D3803-1989 for purposes of performance monitoring. Therefore, we consider GL 99-02 to be closed for your facilities. The TS change will be reviewed as a separate, plant-specific action under TAC Nos. MA7743, MA7744, and MA7745. We thank you for your prompt and complete response.

If you have any questions regarding this matter, please contact me at (301)415-3062.

Sincerely,
/RA/

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

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

cc: See next page

DISTRIBUTION:

File Center	ACRS	BMozafari	S. Richards
PUBLIC	OGC	JSegala	
PDIV-2 Rdg	L. Smith, RIV	JHannon	

TO RECEIVE A COPY, WRITE A "C" IN THE BOX. *See previous concurrence

OFFICE	PM	C	LA	C	LPM	C	SC: SPLB		SC:DLPM	
NAME	MFields		CJamerson		BMozafari*		EWeiss*		SDembek*	
DATE	01/26/00		01/27/00		01 / 20 /00		01 / 21 /00		01 / 25 /00	

DOCUMENT NAME: C:\gl99-02.wpd

OFFICIAL RECORD COPY

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

cc:

Mr. Steve Olea
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

Douglas Kent Porter
Senior Counsel
Southern California Edison Company
Law Department, Generation Resources
P.O. Box 800
Rosemead, CA 91770

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 40
Buckeye, AZ 85326

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
Harris Tower & Pavillion
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Chairman
Maricopa County Board of Supervisors
301 W. Jefferson, 10th Floor
Phoenix, AZ 85003

Mr. Aubrey V. Godwin, Director
Arizona Radiation Regulatory Agency
4814 South 40 Street
Phoenix, AZ 85040

Ms. Angela K. Krainik, Director
Regulatory Affairs
Arizona Public Service Company
P.O. Box 52034
Phoenix, AZ 85072-2034

Mr. John C. Horne
Vice President, Power Generation
El Paso Electric Company
2702 N. Third Street, Suite 3040
Phoenix, AZ 85004

Mr. David Summers
Public Service Company of New Mexico
414 Silver SW, #1206
Albuquerque, NM 87102

Mr. Jarlath Curran
Southern California Edison Company
5000 Pacific Coast Hwy Bldg DIN
San Clemente, CA 92672

Mr. Robert Henry
Salt River Project
6504 East Thomas Road
Scottsdale, AZ 85251

Terry Bassham, Esq.
General Counsel
El Paso Electric Company
123 W. Mills
El Paso, TX 79901

Mr. John Schumann
Los Angeles Department of Water & Power
Southern California Public Power Authority
P.O. Box 51111, Room 1255-C
Los Angeles, CA 90051-0100

August 18, 1999