



10CFR50.55a

Palo Verde Nuclear
Generating Station

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102-04412-CDM/SAB/RKB

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U. S. Nuclear Regulatory Commission
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Dear Sirs:

References:

1. APS Letter No. 102-04095-WEI/AKK/MLG, dated March 17, 1998, from W. E. Ide, APS, to NRC, "Inservice Inspection Programs for Second 10-Year Interval."
2. APS Letter No. 102-04359- CDM/SAB/RKB, dated October 12, 1999, from C. D. Mauldin, APS, to NRC, "Response to PVNGS Units 1, 2 and 3 Second 10-Year Interval Inservice Inspection Programs – Request for Additional Information (RAI)."
3. APS Letter No. 102-04375-CDM/SAB/RKB, dated November 23, 1999, from C. D. Mauldin, APS, to NRC, "Second 10-Year Interval Inservice Inspection (ISI) Program – Request to Use 1992 Edition, 1992 Addenda of ASME Section XI."
4. APS Letter No. 102-04299-WEI/SAB/RKB, dated June 26, 1999, from W. E. Ide, APS, to NRC, "Request for Proposed Alternative to ASME Section XI Requirements for Repairs and Installations (Code Case N-567)."

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Docket No. STN 50-528, 529 and 530
Second 10-Year Interval Inservice Inspection (ISI) Programs –
Supplemental Information (Relief Request No. 6, Relief Request No. 7
and Code Case N-567)**

In reference 1, Arizona Public Service Company (APS) submitted to the NRC the second 10-year interval ISI programs for PVNGS Units 1, 2 and 3. That submittal also contained several relief requests associated with the second 10-year interval ISI programs. Relief Request No. 7 proposed to utilize the 1989 Edition of the ASME Section XI Code to perform all ultrasonic examinations, in lieu of utilizing the 1992 Edition to perform the ultrasonic examinations. The basis for that relief request, as described in the submittal, was that it would be an undue burden to perform ultrasonic examinations with the additional requirements of Appendix VIII of the 1992 Edition. In

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recent telephone calls, the NRC requested further clarification for the basis of Relief Request No. 7.

In reference 1, APS proposed Relief Request No. 1 to use the 1992 Edition of the ASME Section XI Code with the 1992 Addenda in lieu of the 1989 Edition. In reference 2, APS withdrew Relief Request No. 1, believing that pending changes to 10 CFR 50.55a(b)(2) rendered the relief request unnecessary. Shortly thereafter, it was determined that the November 22, 1999 changes to 10 CFR 50.55a did not negate the need for NRC Staff approval to utilize the 1992 Edition, 1992 Addenda of the ASME Code. Therefore, in reference 3, pursuant to 10 CFR 50.55a(g)(4)(iv), APS requested NRC Staff approval to change from the 1989 Edition to the 1992 Edition, 1992 Addenda of ASME Section XI for the second 10-year interval ISI programs for PVNGS Units 1, 2 and 3.

The 1992 Edition of the ASME Section XI Code contains a number of mandatory requirements for ultrasonic examination in a new Appendix VIII that are beyond the requirements in the 1989 Edition. The new requirements for ultrasonic examination in Appendix VIII would take considerable time to implement in an ISI program. The 1989 Edition of the ASME Section XI code was the latest Code approved in 10 CFR 50.55a(b)(2) prior to the final rule change issued in the September 22, 1999 Federal Register (64 FR 51370) and effective November 22, 1999.

Although there are ultrasonic exam requirements in the 1992 Edition, 1992 Addenda that do not impose the new requirements of Appendix VIII, programmatically it would be prudent to have all the ultrasonic examinations comply with the 1989 Edition rather than have some elements comply with the 1992 Edition, 1992 Addenda and other elements comply with the 1989 Edition. As stated in the relief request, personnel certification and qualification requirements and the evaluation criteria of the 1992 Edition, 1992 Addenda will be utilized. 10 CFR 50.55a, as amended, requires a phased implementation of Appendix VIII to Section XI of the 1995 Edition through the 1996 Addenda.

APS intends to comply with the implementation requirements of 10 CFR 50.55a(g)(6)(ii)(C). As Appendix VIII Supplements are phased in, Relief Request No. 7 will no longer be relevant for those program areas and components covered by the applicable Supplements.

In reference 1, APS also submitted Relief Request No. 6, which requested an alternative to utilize 10 CFR 50, Appendix J testing in lieu of the Code required pressure tests for certain containment penetrations outside the scope of Code Case N-522. APS hereby withdraws this request for relief.

Finally, in reference 4, APS requested NRC Staff approval to utilize Code Case N-567, which was not approved for use in Regulatory Guide 1.147, Revision 12. Due to recent changes in 10 CFR 50.55a which became effective November 22, 1999, APS no longer

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requires the use of this code case. Therefore, APS hereby withdraws the request for NRC Staff approval to use Code Case N-567.

In summary, APS believes the additional clarification provided regarding Relief Request No. 7 of the second 10-year interval ISI program supports its approval. APS is withdrawing both Relief Request No. 6 of the second 10-year interval ISI program as well as the alternative request to use ASME Code Case N-567.

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

Should you have any questions, please contact Scott A. Bauer at (623) 393-5978.

Sincerely,



CDM/SAB/RKB

cc: E. W. Merschoff [Region IV Administrator]
M. B. Fields [NRR – Project Manager]
J. H. Moorman [Senior Resident Inspector]