

December 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 -  
COMPLETION OF LICENSING ACTION FOR GENERIC LETTER 98-02, "LOSS  
OF REACTOR COOLANT INVENTORY AND ASSOCIATED POTENTIAL FOR  
LOSS OF EMERGENCY MITIGATION FUNCTIONS WHILE IN A SHUTDOWN  
CONDITION" (TAC NO. MA4771)

Dear Mr. Overbeck:

On May 28, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-02 to all holders of operating licenses for Pressurized Water Reactors (PWR), except those who have permanently ceased operations, and have certified that fuel has been permanently removed from the reactor vessel. The NRC issued GL 98-02 to request that PWR licensees evaluate a September 17, 1994, event, which occurred at Wolf Creek, which had the potential to drain down the reactor coolant system to the refueling water storage tank and, at the same time, render the emergency core cooling system (ECCS) and residual heat removal (RHR) system inoperable by introducing a steam/water mixture to the suction side of the ECCS and RHR pumps. Addressees of GL 98-02 were requested to provide the following information within 180 days: (1) an assessment of whether the addressee's facility is vulnerable to the September 17, 1994, Wolf Creek event, and (2) if the facility is found to be vulnerable, an assessment of the plant-specific 10 CFR Part 50, Appendix B, quality assurance program attributes that will prevent the subject event. If the addressee's facility was determined to be vulnerable, a response to information item (1) was to be provided pursuant to 10 CFR 50.54(f) and 10 CFR 50.4, and the responses to information items (1) and (2) were to be kept in a licensee's retrievable system for use by the NRC staff on an as-needed basis.

In response to GL 98-02, your staff provided a verbal statement to your project manager that indicated Palo Verde Nuclear Generating Station, Units 1, 2, and 3, (PVNGS) was not vulnerable to the type of incident which occurred at Wolf Creek and that the plant evaluation concerning the subject vulnerability (information item (2) of GL 98-02), was being kept in a retrievable licensee system that the NRC can verify on an as-needed or sample basis, in accordance with GL 98-02.

By letter dated November 3, 1999, the Region IV NRC staff issued NRC Inspection Report Nos. 50-528/99-19; 50-529/99-19; 50-530/99-19. The subject inspection report contained details of the NRC staff's onsite verification of activities that you undertook in response to GL 98-02 for the three units. Specifically, the inspector verified that an assessment had been made of the inadvertent draindown event described in the generic letter, that the assessment

was on file, and that the determination of the assessment was that plant systems were not vulnerable. The assessment was also found by the inspector to be reasonable.

The NRC staff has reviewed your response to GL 98-02 and has concluded that (1) all the information requested by GL 98-02 has been provided and (2) that your onsite activities adequately addressed the concerns of GL 98-02 for PVNGS. Based on this, we consider GL 98-02 to be closed for PVNGS. If you have any questions, contact me at 301-415-1307, or by email at [jnd@nrc.gov](mailto:jnd@nrc.gov).

Sincerely,

*/RA/*

Jack N. Donohew, Senior 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

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Jack N. Donohew, Senior Project Manager, Section 2  
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August 18, 1999