



Palo Verde Nuclear  
Generating Station

Gregg R. Overbeck  
Senior Vice President  
Nuclear

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**10CFR50.54(f)**

Mall Station 7602  
P.O. Box 52034  
Phoenix, AZ 85072-2034

102-04669-GRO/SAB/RJR  
March 15, 2002

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

- References:
1. Letter 102-04603-CDM/SAB/RJR, dated September 4, 2001, "Response to NRC Bulletin 2001-01: Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles," from C. D. Mauldin, APS to USNRC.
  2. Letter dated November 5, 2001, "Palo Verde Nuclear Generating Station, Units 1, 2, and 3 – Telephone Conference Summary RE: Responses to Bulletin 2001-01," from L. R. Wharton, USNRC to G. R. Overbeck, APS.
  3. Letter 102-04628-GRO/SAB/RJR, dated December 06, 2001, "Revised Inspection Schedule in Response to NRC Bulletin 2001-01, from Gregg R. Overbeck, APS to USNRC.
  4. Telephone Conferences, dated December 13, 2001 and December 14, 2001, Discussion on Supplemental Response Letter (Reference 3) between APS Staff and USNRC Staff.
  5. Letter 102-04650-GRO/SAB/RJR, dated January 29, 2002, "Response to NRC Bulletin 2001-01 Request for Additional Information," from Gregg R. Overbeck, APS to USNRC.

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2 and 3  
Docket Nos. STN 50-528, 50-529, and 50-530  
NRC Bulletin 2001-01 Inspection Method**

This letter amends the Arizona Public Service Company (APS) response to NRC Bulletin 2001-01, Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles.

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As a result of pre-outage planning for the reactor vessel head penetration (VHP) inspections, APS has identified some concerns with the ability to successfully perform under the head exams on all nozzles due to accessibility issues.

APS' current commitment, as identified in Reference 5, is to perform 100 percent inspection of the VHPs using a combination of eddy current, liquid penetrant, and ultrasonic examination techniques as necessary. The inspection of the reactor head vent nozzle will be performed by an effective visual examination or by under the head surface and/or volumetric examinations.

APS is now committing to perform a 100 percent inspection of the VHPs using either an effective visual examination, or under the head surface and/or volumetric examinations using a combination of eddy current, liquid penetrant, and ultrasonic examination techniques as necessary. This inspection will include the reactor head vent nozzle.

The schedule for conducting the proposed inspection remains as provided in Reference 3. APS will finalize its proposed inspection schedule for Units 1 and 3 based on the results of the Unit 2 inspections and provide the schedule to the NRC.

No new commitments are being made to the NRC by this letter. Please contact Thomas N. Weber at (623) 393-5764 if you have any questions or require additional information.

Sincerely,



GRO/SAB/RJR/kg

cc: E. W. Merschoff  
J. N. Donohew  
J. H. Moorman

A001

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**bcc. CONCURRENCE**

T. N. Weber (7636)  
S. A. Bauer (7637)  
M. J. Winsor (7669)  
C. D. Mauldin (7605)

TNW...  
SA  
MJW  
CDM

w/o attachments  
w/o attachments  
w/o attachments  
w/o attachments

<b><u>bcc.</u></b>	NOC	(7602)	w/o attachments
	M. A. Melton	7545)	w/o attachments
	M. E. Powell	(7299)	w/o attachments
	M. J. Sontag	(7997)	w/o attachments
	M. K. Banks	(7615)	w/o attachments
	N. E. Meador	(7636)	w/o attachments
	G. R. Overbeck	(7602)	w/o attachments
	W. E. Ide	(7616)	w/o attachments
	B. A. Pregulman	(8695)	w/o attachments
	C. K. Seaman	(7636)	w/o attachments

**STARS Distribution**

<input checked="" type="checkbox"/>	e-Mail
<input type="checkbox"/>	Hard Copy
<input type="checkbox"/>	None

**COMMITMENTS**

RCTS Action #: 2419216  
Action Group: ISI  
Assign To: (Optional) Melton, M  
Parent Record #: \_\_\_\_\_ Unit 2 Trend Code

Date Due: \_\_\_\_\_ Milestone ID: (If Applicable) R10

Description: Perform a 100% inspection of U2 CEDM nozzles as identified in APS' revised response to NRC Bulletin 2001-01. The inspection of the Reactor Vessel Head Penetrations may be completed using effective visual inspection, or under the head surface and/or volumetric examinations. Provide update to NRC within 30 days following restart.

\* 1  
2  
3  
All

\*\* Active Y  
Active N  
Obligation Mgmt  
Periodic  
Work Mgmt

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RCTS Action #: 2419214  
 Action Group: ISI  
 Assign To: (Optional) Melton, M  
 Parent Record #: \_\_\_\_\_ Unit \* \_\_\_\_\_ Trend Code

\*\*

Date Due: \_\_\_\_\_ Milestone ID: (If Applicable)

Description: Finalize proposed inspection schedule for Units 1 and 3 and submit the schedule to the NRC and open additional Actions for Units 1 and 3.

1	**	Active Y
2		Active N
3		Obligation Mgmt
All		Periodic Work Mgmt

**SOURCE DOCUMENTS**

1. NRC Bulletin 2001-01
2. Letter 102-04603-CDM/SAB/RJR, dated September 4, 2001, "Response to NRC Bulletin 2001-01: Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles," from C. D. Mauldin, APS to USNRC.
3. Letter dated November 5, 2001, "Palo Verde Nuclear Generating Station, Units 1, 2, and 3 – Telephone Conference Summary RE: Responses to Bulletin 2001-01," from L. R. Wharton, USNRC to G. R. Overbeck, APS.
4. Letter 102-04628-GRO/SAB/RJR, dated December 06, 2001, "Revised Inspection Schedule in Response to NRC Bulletin 2001-01, from Gregg R. Overbeck, APS to USNRC.
5. Telephone Conference, dated December 13, 2001, Discussion on Supplemental Response Letter (Reference 3) between APS Staff and USNRC Staff.
6. Email from TNW, 12/14/01, Summary of NRC Phone Call on Bulletin 2001-01
7. Email from MJW, 01/08/02, Response to NRC on CEDM Nozzle Inspections

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**VERIFICATION OF ACCURACY**

**RA Preparer:** I have prepared the attached document and validated selected statements of fact to the identified source and Licensing Basis documents (QV&V).

 / R J Rogalski / 3/8/02  
Signature Printed Date

**Technical Input:** I have reviewed and verified that the technical information been accurately translated and correctly described.

NA / /  
Signature Printed Date

**RA Peer Reviewer:** I have reviewed the attached document for completeness, QV&V adequacy and submittal quality.

NA / /  
Signature Printed Date

**Other Licensing Document Changes:**

UFSAR [X] NO [ ] Yes LDCR \_\_\_\_\_

TS Bases [X] NO [ ] Yes LDCR \_\_\_\_\_

TRM [X] NO [ ] Yes LDCR \_\_\_\_\_

OTHER [X] NO [ ] Yes Tracking Number \_\_\_\_\_

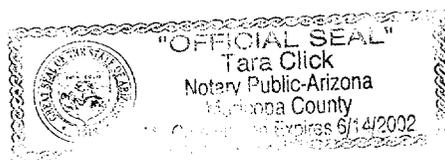
STATE OF ARIZONA        )  
  ) ss.  
COUNTY OF MARICOPA    )

I, Gregg R. Overbeck, represent that I am Senior Vice President – Nuclear, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority to do so, and that to the best of my knowledge and belief, the statements made therein are true and correct.

*Gregg R. Overbeck*  
Gregg R. Overbeck

Sworn To Before Me This 15<sup>th</sup> Day Of March, 2002.

*Tara Click*  
Notary Public



\_\_\_\_\_  
Notary Commission Stamp

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**PVNGS Document Authorization Routing Slip**

102 04/669  
3-15-2002

NUCLEAR REGULATORY AFFAIRS  
DATE:

Special Instructions:	Draft File Name: H:\NRA\rchr\Bulletin 2001-01/B2001-01 Inspection Method Change.doc
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**BRIEF DESCRIPTION:**  
 Changing NRC Bulletin commitment to allow the use of an effective visual examination or under the head surface and/or volumetric examinations for each VHP nozzle.

**DUE TO NRC ON:** \_\_\_\_\_ **HARD DUE DATE:** Yes \_\_\_\_\_ No X

**TO FINAL APPROVER**

Target Date: 02/28/02  
(To Final Reviewer 3 Days Prior to Due Date)

Actual Date: 1/1  
(Date Final Reviewer Received)

Signature Date: 1/1  
(Date Approved/Enter Date)

ROUTE TO INDIVIDUAL	STA.	SIGNATURE REQUIRED	REVIEW REQUIRED	DATE REVIEWED/APPROVED	COMMENTS
T. N Weber	7636		X	3/12/02	incorp
S. A. Bauer	7636		X	3/12/02	incorp
M. J. Winsor	7669		X	3/13/02	
C. D. Mauldin	7605		X	3/15/02 <sup>cm</sup>	
G. R. Overbeck	7605	X			

RETURN TO: Karen Ganion	STA: 7836	FOR QUESTIONS, CONTACT: Rich Rogalski	EXT.: 5808
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