



10 CFR 50.54(f)

Palo Verde Nuclear  
Generating Station

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102-04838-GRO/SAB/RJR  
September 11, 2002

U.S. Nuclear Regulatory Commission  
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- References:
1. Letter 102-04603-CDM/SAB/RJR, "Response to NRC Bulletin 2001-01: Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles," dated September 4, 2001, from Gregg R. Overbeck, APS to USNRC.
  2. Letter 102-04681-GRO/SAB/RJR, Response to NRC Bulletin 2002-01: "Reactor Pressure Vessel Head Degradation and Reactor Coolant Pressure Boundary Integrity," dated April 03, 2002, from Gregg R. Overbeck, APS to USNRC.
  3. NRC letter dated April 25, 2002, "Conference Calls with Palo Verde Nuclear Generating Station, Unit 2, on RV Head Inspection Plan to Meet Bulletins 2001-01 and 2002-01."
  4. Letter 102-04703-GRO/SAB/RJR, "Response to Information Requested by NRC Bulletin 2001-01 Items 4a, 5a, and 5b and NRC Bulletin 2002-01, Items 2.A and 2.B," dated May 17, 2002, from Gregg R. Overbeck, APS to USNRC.

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. STN 50-528/529/530  
APS' 30-Day Response to NRC Bulletin 2002-02, Reactor Pressure  
Vessel Head and Vessel Head Penetration Nozzle Inspection  
Programs**

In accordance with 10 CFR 50.54(f), this letter contains the Arizona Public Service Company (APS) response to U.S. Nuclear Regulatory Commission (NRC) Bulletin 2002-02, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzle Inspection Programs," dated August 09, 2002.

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*A088*

The PVNGS reactor pressure vessel (RPV) head penetration inspection program is a non-visual NDE program supplemented with bare metal visual inspections of accessible outer periphery control element drive mechanism (CEDM) nozzles. The inspections performed during the Unit 2 refueling outage, completed in April 2002, consisted of the following:

- Volumetric examination of all of the CEDM nozzles
- Effective visual examination of 24 periphery CEDM nozzles
- Effective visual examination of the reactor head vent nozzle

A description of our program, including the methods, scope, coverage, qualification requirements, and acceptance criteria requested by this Bulletin, is contained in References 1 through 4. During the Unit 1 refueling outage this fall and the Unit 3 refueling outage next spring, PVNGS will be performing the same inspection program as performed in Unit 2.

The estimated EDY for each of the PVNGS units is provided in the table below. The EDY is at the time of the baseline inspection for that unit.

<b>Estimated EDY at Each Unit's Baseline Refueling Outage</b>		
<b>PVNGS Unit</b>	<b>Baseline Refueling Outage</b>	<b>Est. EDY<sub>600°F</sub> *</b>
1	Fall 2002	11.2
2	Spring 2002	10.5
3	Spring 2003	11.0

\* EDY calculated in accordance with MRP-48 (Equation 2.2)

The frequency of future RVH penetration inspections intended to identify and repair CEDM nozzle cracking before cracks can result in through-wall leakage will be determined once the baseline inspections for all three Units are complete. Factors such as unit EDY, inspection results, and calculated crack growth rate data for applicable PVNGS CEDM materials from the MRP will be used in the determination of acceptable inspection frequencies going forward.

APS will provide results of the inspections identified above within 30 days of the end of the respective refueling outage. No new commitments are being made in this letter. Should you have any questions, please contact Thomas N. Weber at (623) 393-5764.

Sincerely,

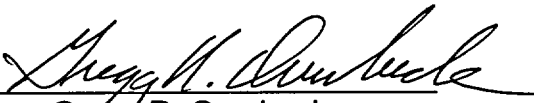


GRO/SAB/RJR/kg

cc: E. W. Merschoff  
J. N. Donohew  
N. L. Salgado

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

Sworn To Before Me This 11<sup>th</sup> Day Of September, 2002.

  
Notary Public

August 28, 2004  
Notary Commission Stamp

