APS

Palo Verde Nuclear Generating Station

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EA-03-009

102-05099-CDM/SAB/RJR
April 28, 2004

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

Reference: APS letter 102-05075-CDM/SAB/RJR, "Relief Request No. 25 – Request for Relaxation of First Revised NRC Order EA-03-009, Section IV.C.(5)(b) Requirements for CEDM Nozzles," dated March 19, 2004.

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Docket No.s STN 50-528, 50-529 and 50-530
APS' Commitment for CEDM Nozzle Inspections for First Revised NRC Order EA-03-009

In the letter referenced above, Arizona Public Service Company (APS) requested relaxation of the requirements of Order Section IV.C.(5)(b). The examinations for Unit 1 have been completed. For penetration No.s 84, 87, and 93, the minimum required inspection coverage described in Table 1 of the referenced letter was not obtained. The exam coverage for penetration No. 79 was determined to be at the minimum required distance. Ultrasonic and eddy current examination of penetrations 79, 84, 87, and 93 did cover the available distance on the inside diameter of each nozzle leaving no additional distance for examination. APS performed a manual dye penetrant examination from below the J-groove weld (overlapping the volumetric examination) to as low as practical on the outside diameter of these four identified penetration nozzles. No indications were identified.

As discussed with the NRC on April 26, 2004, APS makes the following commitment:

> If APS is unable to perform an ultrasonic examination of the CEDM nozzles which meets the minimum required inspection distances identified in Tables 1 and 2 of the referenced letter, then APS will perform a qualified surface examination on the remaining surface of the inside diameter and a qualified surface examination of the outside diameter of the CEDM nozzle from below the J-groove weld to as low as practical, prior to plant startup.

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No other commitments are being made to the NRC in this letter. Should you have any questions, please contact Thomas N. Weber at (623) 393-5764.

Sincerely,

Richard J. Wais for COM

CDM/SAB/RJR

cc: J. E. Dyer
B. S. Mallett
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N. L. Salgado