



Palo Verde Nuclear  
Generating Station

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**10 CFR 50.55a(g)(4)(iv)**

102-05259-CDM/CKS/TNW  
April 29, 2005

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

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2 and 3  
Docket Nos. STN 50-528/529/530  
Request to Use a Later Edition and Addenda of the ASME Boiler and  
Pressure Vessel Code, Section XI for Repair/Replacement Activities  
at PVNGS in Accordance with 10 CFR 50.55a(g)(4)(iv)**

In accordance with the guidance provided in NRC Regulatory Issue Summary (RIS) 2004-16, "Use of Later Editions and Addenda to ASME Code Section XI For Repair/Replacement Activities" dated October 19, 2004 and in accordance with 10 CFR 50.55a(g)(4)(iv), APS hereby requests NRC approval to use a later Edition of the ASME Boiler and Pressure Vessel Code. Specifically, APS requests approval to use ASME Section XI, 1998 Edition, no Addenda, paragraph IWA 4422.2.1(a), "Defect Removal without Welding or Brazing" and paragraph IWA 2220, "Surface Examination" as described in the enclosure to this letter. All applicable related requirements to the Edition and Addenda of the ASME Code are also listed in the enclosure.

The need for this request originated from inspections performed on the reactor vessel head vent line nozzle during the current Unit 2 refueling outage as required by the First Revised Order (EA-03-009), Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors. The current ASME Code of record for PVNGS is the 1992 Edition with 1992 Addenda which does not allow the use of eddy current examination as a surface examination to verify that indications have been removed. The use of the later edition and addenda of the ASME code will allow APS to use eddy current examinations as a surface examination to verify the indications have been removed from the reactor vessel vent line nozzle.

APS requests NRC approval to use the later edition and addenda of the ASME code identified in the enclosure to this letter at PVNGS Units 1, 2 and 3 for the remainder of

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Request to Use a Later Edition and Addenda of the ASME Boiler and Pressure Vessel Code, Section XI for Repair/Replacement Activities at PVNGS in Accordance with 10 CFR 50.55a(g)(4)(iv)

their respective second 10-year Inservice Inspection Intervals. It is requested that the NRC provide their approval prior to Unit 2 entering Mode 2 (currently scheduled for the week of May 9, 2005) in order to support the restart of PVNGS Unit 2 from the refueling outage.

There are no commitments being made in this letter. If you have any questions, please contact Thomas N. Weber at (623) 393-5764.

Sincerely,



CDM/CKS/TNW

Enclosure:

Request to Use a Later Edition and Addenda of the ASME Code per 10 CFR 50.55a(g)(4)(iv) and RIS 2004-16

cc:	B. S. Mallett	NRC Region IV Regional Administrator
	M. B. Fields	NRC NRR Project Manager
	G. G. Warnick	NRC Senior Resident Inspector for PVNGS

**Enclosure**

**Request to Use a Later Edition and Addenda of  
the ASME Code per 10 CFR 50.55a(g)(4)(iv) and  
RIS 2004-16**

**Request to Use a Later Edition and Addenda of the ASME Code per 10 CFR 50.55a(g)(4)(iv) and RIS 2004-16**

**I. Applicable Code Edition and Requirements**

The current ASME Code of record for PVNGS is the 1992 Edition with 1992 Addenda. The applicable code requirements in the 1992 Edition with 1992 Addenda are as follows:

**IWA-4331, "Defect Removal"**

(a) After final grinding, the affected surfaces, including surfaces of cavities prepared for welding, shall be examined by the magnetic particle or liquid penetrant method to ensure that the indication has been reduced to an acceptable limit in accordance with IWA-3000.

**IWA-2220, "Surface Examination"**

(a) A surface examination indicates the presence of surface discontinuities. It may be conducted by either a magnetic particle or a liquid penetrant method.

(b) Any linear indication that exceeds the allowable linear surface flaw standards shall be recorded.

**IWA-2221, "Magnetic Particle Examination"**

Magnetic particle examination shall be conducted in accordance with Article 7 of Section V.

**IWA-2222, "Liquid Penetrant Examination"**

Liquid penetrant examination shall be conducted in accordance with Article 6 of Section V.

**II. Proposed Alternative Code Edition and Requirements**

The proposed code is the 1998 Edition, no Addenda. The applicable code Requirements from that code are as follows:

**IWA-4422.2.1, "Defect Removal without Welding or Brazing"**

(a) After removal of defects detected by visual or surface examinations, surface examination of the defect removal area shall be performed.

**IWA-2220, "Surface Examination"**

(a) A surface examination indicates the presence of surface discontinuities. It may be conducted by a magnetic particle, a liquid penetrant, or an eddy current method.

(b) Any linear indication that exceeds the allowable linear surface flaw standards shall be recorded.

**Request to Use a Later Edition and Addenda of the ASME Code per 10 CFR 50.55a(g)(4)(iv) and RIS 2004-16**

**IWA-2221, "Magnetic Particle Examination"**

(a) Magnetic particle examination shall be conducted in accordance with Section V, Article 7.

(b) Magnetic particle examination of coated materials shall be conducted in accordance with Section V, Article 7, Appendix I.

**IWA-2222, "Liquid Penetrant Examination"**

Liquid penetrant examination shall be conducted in accordance with Section V, Article 6.

**IWA-2223, "Eddy Current Examination"**

Eddy current examination for detection of surface flaws shall be conducted in accordance with Appendix IV.