



Palo Verde Nuclear
Generating Station

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

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Docket Nos. STN 50-528, 50-529, and 50-530
Revision to Commitment Dates Associated with NRC Generic Letter
2004-02, "Potential Impact of Debris Blockage on Emergency
Recirculation During Design Basis Accidents at Pressurized-Water
Reactors"**

By letter no. 102-05336, dated September 1, 2005, Arizona Public Service Company (APS) submitted to the NRC a response to Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors." In that submittal, APS made a number of regulatory commitments associated with containment sump improvements. By letter no. 102-05449, dated March 20, 2006, APS revised the completion dates of several of those commitments.

As described in SECY-06-0078, dated March 31, 2006, the industry has been developing an understanding of certain aspects of chemical and coating behavior in a post-LOCA environment and establishing an acceptable methodology for evaluating downstream effects. Those industry activities are ongoing.

As a result of the ongoing activities associated with containment sumps, APS must further revise the completion dates for several commitments described in the September 1, 2005 and March 20, 2006 submittals. Provided below is a table containing the complete listing of the regulatory commitments associated with APS' response to GL 2004-02 showing the original commitment due dates and the revised due dates or current status.

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| REGULATORY COMMITMENT (from APS letter no. 102-05336 dated September 1, 2005) | ORIGINAL DUE DATE | REVISED DUE DATE or STATUS |
|---|------------------------------|---|
| 1. Evaluate the recommendations contained in the Westinghouse downstream effects evaluation for PVNGS and establish an implementation schedule for appropriate recommendations. | December 31, 2005 | Completed |
| 2. Perform confirmatory head-loss testing of new strainer with plant specific debris to ensure an adequate design. | March 31, 2006 | March 31, 2007 |
| 3. Verify that a capture ratio of 97% or higher can be achieved in the final design of the new sump screen to ensure that the fuel evaluation contained in the Westinghouse downstream effects evaluation is bounding. | March 31, 2006 | March 31, 2007 |
| 4. Perform sump strainer structural evaluation to ensure seismic and operational integrity. | March 31, 2006 | August 31, 2006 |
| 5. Validate allocated margins for Chemical Effects in strainer head-loss to ensure an adequate design. | May 31, 2006 | March 31, 2007 |
| 6. Perform a confirmatory containment latent debris walkdown of PVNGS Units 1 and 3. | June 30, 2006 | Completed |
| 7. Perform a confirmatory containment unqualified coating walkdown of PVNGS Units 1 and 3. | June 30, 2006 | Completed |
| 8. Review the existing programmatic controls for containment coatings identified in the response to GL 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System after a Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment," for their adequacy. | November 30, 2006 | No Change |

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| REGULATORY COMMITMENT (from APS letter no. 102-05336 dated September 1, 2005) | ORIGINAL DUE DATE | REVISED DUE DATE or STATUS |
|--|---|----------------------------------|
| 9. Review the existing programmatic and procedural controls in place to prevent potentially transportable debris (insulation, signs and foreign material) in the containment building to ensure that the bounding assumptions in the design of the new strainers will be maintained. | November 30, 2006 | No Change |
| 10. Implement in Unit 1 changes to programs and procedures to ensure and/or enhance the control of transportable debris in containment. | 1R13 refueling outage (approx. May 31, 2007) | No Change |
| 11. Implement in Unit 2 changes to programs and procedures to ensure and/or enhance the control of transportable debris in containment. | 2R13 refueling outage (approx. Nov. 30, 2006) | No Change |
| 12. Implement in Unit 3 changes to programs and procedures to ensure and/or enhance the control of transportable debris in containment. | 3R13 refueling outage (approx. Dec. 31, 2007) | No Change |
| 13. Install larger sump strainers in PVNGS Unit 1. | 1R13 refueling outage (approx. May 31, 2007) | No Change |
| 14. Install larger sump strainers in PVNGS Unit 2. | 2R13 refueling outage (approx. Nov. 30, 2006) | No Change |
| 15. Install larger sump strainers in PVNGS Unit 3. | 3R13 refueling outage (approx. Dec. 31, 2007) | No Change |

