



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 Date 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 letters no. 102-05449, dated March 20, 2006, and no. 102-05523, dated June 29, 2006, APS revised the completion dates of several of those commitments.

In the June 29, 2006, letter, APS committed to perform a sump strainer structural evaluation to ensure seismic and operational integrity by August 31, 2006. APS has contracted with Control Components, Inc., (CCI) to design and provide the new containment sump strainers for PVNGS. Due to CCI's workload, which includes designing and supplying new containment sump strainers to other nuclear plants, APS is revising the completion date for the commitment to perform the sump strainer structural evaluation to October 31, 2006.

Provided below is an updated table containing the complete listing of the regulatory commitments associated with APS' response to GL 2004-02 showing the previous 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)	PREVIOUS 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, 2007	No Change
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, 2007	No Change
4. Perform sump strainer structural evaluation to ensure seismic and operational integrity.	August 31, 2006	October 31, 2006
5. Validate allocated margins for Chemical Effects in strainer head-loss to ensure an adequate design.	March 31, 2007	No Change
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)	PREVIOUS 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

