

Palo Verde Nuclear Generating Station David Mauldin Vice President Nuclear Engineering

Tel: 623-393-5553 Fax: 623-393-6077 Mail Station 7605 PO Box 52034 Phoenix, Arizona 85072-2034

102-05609-CDM/SAB/GAM December 08, 2006

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

Supplement to Response to NRC Generic Letter 2003-01, "Control

Room Habitability"

By letter no. 102-05018, dated December 5, 2003, Arizona Public Service Company (APS) submitted to the NRC a 180-day response to NRC Generic Letter (GL) 2003-01, "Control Room Habitability." In that response, APS provided confirmation that the differential pressure (DP) technical specification (TS) surveillance requirement (SR 3.7.11.4) adequately demonstrates the integrity of the PVNGS control room envelope (CRE). APS provided the results of PVNGS Unit 2 control room habitability tracer gas inleakage testing which confirmed that the control room habitability (CRH) system met its design basis requirement. By letter no. 102-05556, dated August 28, 2006, APS submitted the results of the Units 1 and 3 control room tracer gas testing that confirmed that Units 1 and 3 CRH systems also met their design basis requirements.

During the time since GL 2003-01 was issued, the NRC has been working with the nuclear industry Technical Specification Task Force (TSTF) on a proposed TS change that would establish more effective and appropriate action, surveillance, and administrative TS requirements related to ensuring CRH. A proposed model safety evaluation and model application for this change, designated TSTF-448, Revision 3, using the Consolidated Line Item Improvement Process (CLIIP), was published for comment in the October 17, 2006, Federal Register (71FR 61075).

A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance

Callaway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek

ATTN: Document Control Desk U.S. Nuclear Regulatory Commission Supplement to Response to NRC Generic Letter 2003-01, "Control Room Habitability" Page 2

Although the current PVNGS TSs provide assurance of CRE integrity, APS concludes that the changes proposed in TSTF-448, Revision 3, would enhance the CRH program. Therefore, APS commits to submit a TS amendment request to modify the requirements related to control room envelope habitability in accordance with TSTF-448, "Control Room Habitability," as described in the final CLIIP to be published in the *Federal Register*, with any appropriate, justified site-specific deviations. The proposed amendment will be submitted within one year after the final approved CLIIP for TSTF-448 is published in the *Federal Register*.

If you have any questions, please contact Thomas N. Weber at (623) 393-5764.

Sincerely,

CDM/SAB/GAM/

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

David Mauldin