

NRC Generic Letter 2004-02



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

102-05651- CDM/SAB/GAM
March 02, 2007

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 dated January 4, 2007, the NRC notified pressurized water reactor (PWR) licensees that the response due date for the request for additional information (RAI) related to Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," may be extended. The NRC expectation is that "all PWR licensees will submit a complete supplemental response as soon in 2007 as the information and analysis results are available," and "no later than December 31, 2007." The NRC recognized that licensees are experiencing delays in the supporting evaluations as a result of ongoing testing and analyses to support the resolution of chemical effects issues.

Arizona Public Service Company (APS) has been experiencing delays in the supporting GL 2004-02 evaluations for PVNGS similar to those recognized by the NRC in the January 4, 2007 letter. As a result, APS is revising the commitment dates associated with new sump strainer testing, downstream effects, and chemical effects. The revised commitment dates are consistent with the RAI response due dates established in the January 4, 2007 NRC letter. The list of PVNGS GL 2004-02 commitments and due dates is provided in the enclosed table.

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Please note that the containment sump strainer modification installation schedules and fiberfrax insulation removal schedules are not being revised by this letter. The sump strainer modifications will be installed and the fiberfrax insulation removed in Units 1 and 3 during their 2007 refueling outages as previously committed. The sump strainer modification will be installed in Unit 2 during the spring 2008 refueling outage as approved by the NRC in their letter dated December 13, 2006. The fiberfrax insulation was removed from Unit 2 in the fall 2006 refueling outage, as previously committed.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "David M. Paulden".

CDM/SAB/GAM/

Enclosure: As stated

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

Enclosure
List of Generic Letter 2004-02 Commitments and Due Dates

GL 2004-02 REGULATORY COMMITMENT (from APS letter no. 102-05560 dated August 30, 2006)	MOST RECENT DUE DATE	NEW DUE DATE BY THIS LETTER
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	As soon in 2007 as achievable, and no later than December 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, 2007	As soon in 2007 as achievable, and no later than December 31, 2007
4. Perform sump strainer structural evaluation to ensure seismic and operational integrity.	October 31, 2006	Completed
5. Validate allocated margins for Chemical Effects in strainer head-loss to ensure an adequate design.	March 31, 2007	As soon in 2007 as achievable, and no later than December 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

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GL 2004-02 REGULATORY COMMITMENT (from APS letter no. 102-05560 dated August 30, 2006)	MOST RECENT DUE DATE	NEW DUE DATE BY THIS LETTER
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	Completed
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	Completed
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)	Completed
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.	2R14 refueling outage (to begin no later than April 28, 2008)	No Change

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GL 2004-02 REGULATORY COMMITMENT (from APS letter no. 102-05560 dated August 30, 2006)	MOST RECENT DUE DATE	NEW DUE DATE BY THIS LETTER
15. Install larger sump strainers in PVNGS Unit 3.	3R13 refueling outage (approx. Dec. 31, 2007)	No Change
16. Remove installed Fiberfrax insulation in PVNGS Unit 1.	1R13 refueling outage (approx. May 31, 2007)	No Change
17. Remove installed Fiberfrax insulation in PVNGS Unit 2.	2R13 refueling outage (approx. Nov. 30, 2006)	No Change
18. Remove installed Fiberfrax insulation in PVNGS Unit 3.	3R13 refueling outage (approx. Dec. 31, 2007)	No Change
19. After plant specific strainer testing has been completed and the Westinghouse downstream effects evaluation for PVNGS has been evaluated, APS will submit an update to the NRC to report the validation of the allocated margins for chemical effects and identify any recommendations from the Westinghouse evaluation to be implemented.	March 31, 2007	To be submitted along with the NRC RAI response as soon in 2007 as the results are available, and no later than December 31, 2007

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References

Arizona Public Service Company Letters

1. Letter no. 102-05221, March 4, 2005, 90-Day Response to NRC Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors."
2. Letter no. 102-05304, July 9, 2005, Response to NRC Request for Additional Information Related to Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors."
3. Letter no. 102-05336, September 1, 2005, Response to Request No. 2 in NRC Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors."
4. Letter no. 102-05449, March 20, 2006, 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."
5. Letter no. 102-05523, June 29, 2006, 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."
6. Letter no. 102-05560, August 30, 2006, 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."
7. Letter no. 102-05584, October 12, 2006, Unit 2 - Request for Extension to Delay Implementation of Containment Sump Strainer Changes Associated with NRC Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors."

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List of Generic Letter 2004-02 Commitments and Due Dates

References (continued)

NRC Letters to APS

1. Generic Letter 2004-02, dated September 13, 2004, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors."
2. Letter dated June 2, 2005, Request for Additional Information (RAI) Related To Generic Letter 2004-02, "Potential Impact Of Debris Blockage On Emergency Sump Recirculation At Pressurized-Water Reactors."
3. Letter dated February 9, 2006, Request For Additional Information Re: Response To Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors."
4. Letter dated March 28, 2006, Alternative Approach for Responding to the Nuclear Regulatory Commission Request for Additional Information Letter Re: Generic Letter 2004-02.
5. Letter dated December 13, 2006, Unit 2 - Approval of Generic Letter 2004-02 Extension Request.
6. Letter dated January 4, 2007, Alternative Approach for Responding to the Nuclear Regulatory Commission Request for Additional Information Letter Regarding Generic Letter 2004-02.