



A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear
Generating Station

Dwight C. Mims
Vice President
Regulatory Affairs and Plant Improvement

Tel. 623-393-5403
Fax 623-393-6077

Mail Station 7605
P. O. Box 52034
Phoenix, Arizona 85072-2034

102-05710-DCM/TNW/GAM
June 18, 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 50-528/529/530
Supplement to Inservice Inspection (ISI) Relief Request No. 36 –
Proposed Alternative Associated With the Use of Full-Structural
Weld Overlays in the Repair of Dissimilar Metal Welds**

By letter no. 102-05641, dated February 8, 2007, Arizona Public Service Company (APS) submitted inservice inspection (ISI) relief request (RR) No. 36 for a proposed alternative associated with the use of full-structural weld overlays in the repair of dissimilar metal welds at PVNGS. In response to a request from the NRC on June 15, 2007, APS is revising paragraph no. 3(c)3 in Enclosure 1 (E-1) Page 11 of the February 8, 2007, submittal as follows (new additional wording is underlined):

The inservice examination acceptance standards of Table IWB-3514-2 shall be applied to planar indications detected in the weld overlay material. If the planar indication is found acceptable per Table IWB-3514-2, the weld overlay will be re-examined in accordance with 3(c)5. If the inservice acceptance criteria of Table IWB-3514-2 are not met, the planar flaw may be evaluated in accordance with IWB-3640, provided that the flaw is not caused by PWSCC. If accepted for continued service the weld overlay will be re-examined in accordance with 3(c)5. If the flaw is not acceptable for continued service per IWB-3640, then it shall be repaired.

APS agrees to this change because the evaluation allowed by IWB-3640 is for flaws exceeding the acceptance standards of IWB-3514.1, "Allowable Planar Flaws," which does not include flaws caused by Primary Water Stress Corrosion Cracking (PWSCC).

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

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

A047

NRL

This letter does not make any commitments to the NRC. If you have any questions, please contact Glenn Michael at (623) 393-5750.

Sincerely,

D.C. Morris

DCM/TNW/GAM/gat

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