



Palo Verde Nuclear
Generating Station

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102-05711-TNW/RJR
June 19, 2007

Ms. Annette L. Vietti-Cook
Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

DOCKETED
USNRC

June 20, 2007 (10:15am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Comments on Proposed Rulemaking to Industry Codes and
Standards, 10 CFR 50, RIN 3150-AH76**

Dear Ms. Cook,

Arizona Public Service Company (APS) would like to take advantage of this opportunity to comment on the proposed rulemaking to Industry Codes and Standards noticed in the April 5, 2007, Federal Register (72 FR 16731). APS has reviewed the comments being submitted by the American Society of Mechanical Engineers (ASME) and the Strategic Teaming and Resource Sharing (STARS) Alliance and has additional comments for your review.

APS supports the comments being submitted by ASME and STARS. The additional APS comments are provided in the following table.

FR Page 16740	(g)(6)(ii)(D)(3) Requires that examination be "essentially 100 percent".	Recommend that a note be added to document that Appendix I of the code case may be used when approved as required in (D)(6).
	(g)(6)(ii)(D)(3) Requires all J-Groove welds be surface examined. To do all these welds would add significant time and radiological exposure to the RVHP examinations. APS has just spent 3 days doing 4 partial J-Groove weld examinations.	Recommend that this be changed to allow a UT "leak-path" examination in lieu of the J-Groove surface examinations.
	(g)(6)(ii)(D)(4)(i) thru (iv) NDE personnel, equipment, and techniques currently in place to support the requirements of NRC Order EA-09-003 have been demonstrated and are being implemented without additional leaks being detected. The proposed change will only add additional time and costs to the process with little, if any, increase to the health and safety of the public.	Recommend that (D)(4) in its entirety be deleted.

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

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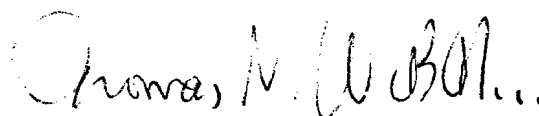
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SECY-02

FR Page 16741	(g)(6)(ii) D 6 Appendix I allows for the examination coverage to be modified based on analysis. Until such time that PWSCC is identified in a resistant material head, it does not appear that the requirement to implement Appendix I only after NRC approval is warranted.	It is recommended that the Code Case requirements in - 2500 be utilized as written.
	(g)(6)(ii)(E)(1) States that this Code Case does not apply to material not mitigated by weld overlay or stress improvement. Numerous small nozzles and penetrations have been mitigated by half-nozzle replacement or Alloy 690/52/152 weld pads.	It is recommended that nozzles and penetrations that have been mitigated by half-nozzle replacement or Alloy 690/52/152 weld pads should also be exempted from the requirements.
	(g)(6)(ii)(E)(3) This section utilized the term "non-visual NDE."	Since there is a visual component of essentially all NDE methods, it is recommended that the terms surface or volumetric be utilized.
	(g)(6)(ii)(E)(4) This paragraph imposes the rules of Appendix VIII to components where qualification may not have been performed (possibly due to size, thickness, etc).	Since the component causing the implementation of this paragraph is leaking, the NDE method and techniques utilized to characterize the leak in paragraph 2 should be sufficient qualification.

APS appreciates the opportunity to comment on the proposed rule.
 If you have any questions, please contact Glenn Michael at (623) 393-5750.

Sincerely,



TNW/GAM/RJR/gt

From: Gail.Tabb@aps.com
Date: Tue, Jun 19, 2007 8:20 PM
Subject: E-Distribution of Letter 102-05711: PVNGS Units 1,2 , & 3 Comments on Proposed Rulemaking to Industry Codes and Standards, 10 CFR 50, RIN 3150-AH76

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LETTER: 102-05711

SUBJECT:
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If any questions, please contact:

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Gail Tabb	623-393-5031

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