



Palo Verde Nuclear  
Generating Station

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102-05861-DCM/RJR  
June 6, 2008

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  
Request for Extension to Complete the Final Confirmatory Analysis  
and Validation of Containment Sump Strainers Associated with NRC  
Generic Letter (GL) 2004-02**

By letter no. 102-05779, dated December 10, 2007, Arizona Public Service Company (APS) submitted a request for an extension to complete the containment sump strainer confirmatory testing, analysis, and validation for PVNGS Units 1, 2, and 3 by June 30, 2008 (ADAMS Accession no. ML073531095). By letter dated December 27, 2007, the NRC approved this extension request (ADAMS Accession no. ML073600747).

The installation of the new, larger containment sump strainers has been completed in all three PVNGS units. Plant specific chemical effects testing of the strainer design was performed by the strainer vendor, Control Components, Inc. (CCI), in 2007. Additional testing was recently completed by CCI, and observed by representatives from the NRC and APS, using more conservative parameters than the 2007 tests. The preliminary results from the recent tests confirmed the capability of the strainer design to perform its safety function.

In order to complete the containment sump strainer test reports and update the design documentation to reflect the more conservative test criteria, APS is requesting to extend the commitment to complete the analysis and validation of containment sump strainers from June 30, 2008, to September 30, 2008, and submit the final GL 2004-02 response within 45 days of completion of the analysis and validation. The basis for the acceptability of this extension remains the same as the basis provided in APS's December 10, 2007, extension request and in the December 27, 2007, NRC approval letter.

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

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Contingent on NRC approval, APS commits to complete the containment sump strainer confirmatory analysis and validation for PVNGS Units 1, 2, and 3 by September 30, 2008. APS also commits to submit the final GL 2004-02 response within 45 days of the completion of the confirmatory analysis and validation.

If you have any questions, please contact Russell A. Stroud at (623) 393-5111.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 6/6/08.

Sincerely



DCM/RAS/RJR/gat

cc: E. E. Collins Jr.      NRC Region IV Regional Administrator  
M. T. Markley          NRC NRR Project Manager  
R. I. Treadway          NRC Senior Resident Inspector for PVNGS