



A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear
Generating Station

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102-05965-DCM/GAM
February 25, 2009

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
Plan to Resolve Deficiency in the PVNGS License Renewal
Application**

By letter no. 102-05937, dated December 11, 2008, Arizona Public Service Company (APS) submitted a license renewal application (LRA) for PVNGS Units 1, 2, and 3. By letter dated February 13, 2009, the NRC notified APS of a deficiency in the PVNGS LRA regarding missing valve fatigue analysis information, and requested that APS supplement the LRA to address this deficiency. In addition, the NRC requested that APS re-review the PVNGS LRA to identify and correct similar deficiencies that may exist elsewhere in the application. The NRC requested that APS respond within 14 days of receipt of the letter to inform the staff of plans for resolving the deficiency and supplementing the LRA.

As identified in the LRA, APS was missing the fatigue analysis for four models of Borg-Warner valves required for time-limited aging analyses (TLAA) for ASME III Class 1 valves greater than four inches. In addition, APS has re-reviewed the PVNGS LRA for similar deficiencies, and found that one model of 3/4 inch Crosby safety injection system relief valve requires a TLAA because the Updated Final Safety Analysis Report Section 5.2.2.4.4.2 states that these valves are designed to withstand a specific number of thermal cycles. APS commits to recover and evaluate the missing valve fatigue analysis for the time-limited aging analyses required by 10 CFR 54.21(c)(1) and submit a supplement to the PVNGS LRA to include the valve fatigue analysis information no later than April 15, 2009.

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If there are any questions or if additional information is needed regarding this submittal, please contact Angela K. Krainik, License Renewal Department Leader, at 623-393-5045.

Sincerely,



DCM/SAB/GAM/gat

cc:	E. E. Collins Jr.	NRC Region IV Regional Administrator
	J. R. Hall	NRC NRR Project Manager
	R. I. Treadway	NRC Senior Resident Inspector
	B. E. Holian	NRC License Renewal Director
	J. G. Rowley	NRC License Renewal Project Manager
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