



A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear
Generating Station

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102-06062-DCM/DFS
September 17, 2009

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

- References: 1. Arizona Public Service Company Letter No. 102-06041, "Response to Request for Additional Information on Request for Amendment to Technical Specification 5.5.16, Containment Leakage Rate Testing Program," dated July 31, 2009
2. Arizona Public Service Company Letter No. 102-05902, "Request for Amendment to Technical Specification 5.5.16, Containment Leakage Rate Testing Program," dated October 1, 2008, (Agencywide Document Access and Management System [ADAMS] Accession No. ML082820029)

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528, 50-529 and 50-530
Response to Request for Additional Information on Request for
Amendment to Technical Specification 5.5.16, Containment Leakage Rate
Testing Program

This correspondence provides Arizona Public Service Company's (APS's) response to a request for clarification of the information provided in Reference 1 regarding the license amendment request for Technical Specification 5.5.16, Containment Leakage Rate Testing Program provided in Reference 2. During a teleconference on August 12, 2009, the NRC requested that APS clarify certain information regarding containment visual and tendon examinations, penetration test results and containment leak rate acceptance criteria. APS has provided the requested response in the enclosure to this letter.

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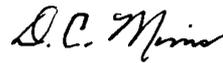
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As part of this response, APS commits, during the requested extended ILRT interval, to perform a supplemental general visual examination of the accessible external concrete containment surfaces of each unit in accordance with the guidance of Nuclear Energy Institute (NEI) 94-01, "Guidance for Implementing Performance Based Option of 10 CFR 50, Appendix J," Revision 2A, dated October 2008.

Should you need further information regarding this response, please contact Russell A. Stroud, Licensing Section Leader, at (623) 393-5111.

Sincerely,



DCM/RAS/DFS/gat

Enclosure: Response to Request for Additional Information on Request for Amendment to
Technical Specification 5.5.16, Containment Leakage Rate Testing Program

cc:	E. E. Collins Jr.	NRC Region IV Regional Administrator
	J. R. Hall	NRC NRR Project Manager
	R. I. Treadway	NRC Senior Resident Inspector for PVNGS
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ENCLOSURE

**Response to Request for Additional Information on Request for
Amendment to Technical Specification 5.5.16, Containment Leakage
Rate Testing Program**

This document provides Arizona Public Service Company's (APS's) response to NRC questions provided during a conference call on August 12, 2009.

1.0 Clarification Regarding Request for Additional Information (RAI) 1.2 Response on Visual Examinations of Containment External Surfaces

In the response to RAI Question 1.2 in Reference 2 of this enclosure, APS provided the inspections scheduled to be completed to meet the requirements of ASME Code, Section XI, Subsections IWE and IWL prior to the extended 15 year interval.

a) NRC Request:

Provide clarification regarding the 30th and 35th year tendon integrity examinations for Unit 1 in the response to RAI Question 1.2, which is different than the schedule provided in Relief Request (RR)-L4. The RR-L4 schedule for Unit 1 is the 25th and the 35th year. The NRC noted a similar issue with Units 2 and 3 tendon integrity examinations.

APS Response:

The 30th and 35th year tendon examinations provided in the RAI response (Reference 2 of this enclosure) were based on the standard IWL examination frequency. The approved tendon integrity examination schedule, with application of RR-L4, is:

Unit 1

Tendon Integrity Examinations

- 25th-year examination: completed December 20, 2008
- 35th-year examination: December 20, 2018 (examination window – December 20, 2017 through December 20, 2019)

Unit 2

Tendon Integrity Examinations

- 20th-year examination: completed February 5, 2006
- 25th-year examination: February 5, 2010 (examination window – February 5, 2009 through February 5, 2011)
- 35th-year examination: February 5, 2020 (examination window – February 5, 2019 through February 5, 2021)

Unit 3

Tendon Integrity Examinations

- 15th-year examination: completed September 17, 2002
- 25th-year examination: September 17, 2011 (examination window - September 17, 2010 through September 17, 2012)
- 35th-year examination: September 17, 2021 (examination window - September 17, 2020 through September 17, 2022)

Each of the tendon integrity examinations includes a general visual inspection of the accessible portions of the containment surface in the area of the tendons.

b) NRC Request:

Provide clarification of the visual inspection schedule for Exterior Concrete Containment (IWL) Examinations. Specifically, the APS license amendment request (LAR) submittal, dated October 1, 2008, (Reference 1 of this enclosure), provided the IWL examination schedule based on the approved RR-L3. That schedule included examinations in the 5th and 15th years for Unit 1, and the 10th and 20th years for Units 2 and 3. The schedule provided in the RAI response, dated July 31, 2009, (Reference 2 of this enclosure), included the 10th and 15th years for Unit 1 and the 10th year and 15th year for Units 2 and 3. Also provide information on how APS is going meet the guidance in Nuclear Energy Institute (NEI) 94-01, Guidance for Implementing Performance Based Option of 10 CFR 50, Appendix J, Revision 2A, dated October 2008 for the external concrete containment inspection requirements for the extended 15-year Integrated Leak Rate Test (ILRT) (Reference 3 of this enclosure).

APS Response:

The RAI response was based on the standard IWL program frequency. The approved IWL program schedule in accordance with TS 5.5.16 and with application of RR-L3, is:

Unit 1

Exterior Concrete Containment (IWL) Examinations

- Baseline examination: completed September 2001
- 5th-year after baseline examination: completed September 2006
- 15th-year after baseline examination: September 8, 2016 (examination window – September 8, 2015 through September 8, 2017)

Unit 2

Exterior Concrete Containment (IWL) Examinations

- Baseline examination: completed September 2001
- 10th-year after baseline examination: September 8, 2011 (examination window – September 8, 2010 through September 8, 2012)
- 20th-year after baseline examination: September 8, 2021 (examination window – September 8, 2020 through September 8, 2022)

Unit 3

Exterior Concrete Containment (IWL) Examinations

- Baseline examination: completed September 2001
- 10th-year after baseline examination: September 8, 2011 (examination window - September 8, 2010 through September 8, 2012)
- 20th-year after baseline examination: September 8, 2021 (examination window – September 8, 2020 through September 8, 2022)

Each of the above IWL examinations include inspection of the accessible containment surface of the associated unit.

As noted in the following summary table, APS commits, during the requested extended ILRT interval, to perform a supplemental general visual examination of the accessible external concrete containment surfaces of each unit in accordance with the guidance of Nuclear Energy Institute (NEI) 94-01, "Guidance for Implementing Performance Based Option of 10 CFR 50, Appendix J," Revision 2A, dated October 2008.

Summary Examination Schedule

The schedules for general visual examinations of the external surfaces of the containment building within the 15-year ILRT interval to meet the NEI 94-01 guidance are as follows:

	Previous ILRT	1 st IWL Exam	2 nd IWL Exam	Supplemental General Visual Exam	Pre-ILRT General Visual Exam
Unit 1	Nov 1999	Sep 2001	Sep 2006	2011	Oct 2014
Unit 2	Nov 2000	Sep 2001	Sep 2011	2013	Oct 2015
Unit 3	Apr 2000	Sep 2001	Sep 2011	2013	Apr 2015

The examinations listed in the table above as IWL are the IWL examinations which have been completed or are currently scheduled within the extended 15-year ILRT interval. The pre-ILRT and supplemental general visual examinations listed in the table are general visual examinations which will be completed during the extended ILRT interval. The general visual examinations include a visual inspection of the accessible containment surfaces. The schedule dates for future examinations are approximate. This schedule meets the requirement of Regulatory Position C.3 of Regulatory Guide 1.163, which requires a visual examination before initiating a Type A test and two visual examinations between tests. It also is consistent with the guidance in section 9.2.3.2 of NEI 94-01 Revision 2A, which increased the number of visual examinations between ILRTs from two to three when the Type A test interval has been extended to 15 years.

2.0 Clarification Regarding RAI 1.5 Response, Fuel Transfer Tube Penetration Test Results

a) NRC Request:

Provide clarification on what local leak rate tests are performed on the fuel transfer tube penetration, and the results of those tests.

APS Response:

The fuel transfer tube penetration discussed in the response to NRC Question 1.5 is designated as Containment Penetration (CP) 53. The blind flange on CP 53 receives a Type B local leak rate test (LLRT) every refueling outage. The LLRT results for CP 53 in Units 1, 2, and 3 are shown in Attachments 4, 5, and 6 of Reference 2 of this enclosure, respectively.

3.0 Clarification Regarding Attachment 7, ILRT Acceptance Criteria

a) NRC Request:

Provide clarification of the acceptance criteria for Attachment 7 of the RAI response.

APS Response:

In Attachment 7, the 0.75 L_a leakage rate acceptance criterion for Type A tests is the as-left criterion. The as-found criterion is 1.0 L_a .

4.0 References

1. Arizona Public Service Company Letter No. 102-05902, "Request for Amendment to Technical Specification 5.5.16, Containment Leakage Rate Testing Program," dated October 1, 2008, (Agencywide Document Access and Management System [ADAMS] Accession No. ML082820029)
2. Arizona Public Service Company Letter No. 102-06041, "Response to Request for Additional Information on Request for Amendment to Technical Specification 5.5.16, Containment Leakage Rate Testing Program," dated July 31, 2009
3. Nuclear Energy Institute (NEI) 94-01, Guidance for Implementing Performance Based Option of 10 CFR 50, Appendix J, Revision 2A, dated October 2008