

10 CFR 50.12
10 CFR 50.60(b)
10 CFR 50.90



A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear
Generating Station

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102-06136-DCM/DAF
February 24, 2010

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
Response to Request for Updated Technical Specification Page**

By letter no. 102-05960, dated February 19, 2009 (Agencywide Document Access and Management System [ADAMS] Accession No. ML090641014), Arizona Public Service Company (APS) submitted a "Request for Technical Specification Amendment and Exemption from 10 CFR 50, Appendix G, to Relocate the Reactor Coolant System Pressure and Temperature Limits and the Low Temperature Overpressure Protection Enable Temperatures."

By correspondence dated August 25, 2009, the NRC issued a request for additional information (RAI) related to this submittal. APS submitted the response to this request in letter no. 102-06112, dated December 22, 2009 (ADAMS Accession No. ML100040069). On February 1, 2010, the NRC requested that APS add the revision number and date to the referenced Topical Report CE NPSD-683-A in the proposed Technical Specification 5.6.9 b and provide the updated page to the NRC. The enclosure provides this requested information on updated Technical Specification page 5.6-9.

APS makes no commitments in this letter. Should you need further information regarding this response, please contact Russell A. Stroud, Licensing Section Leader, at (623) 393-5111.

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

Executed on 9/23/10
(Date)

Sincerely,



DCM/RAS/DAF

Enclosure: Updated Technical Specification Page 5.6-9

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

ENCLOSURE

Updated Technical Specification Page 5.6-9

5.6 Reporting Requirements (continued)

5.6.9 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT
(PTLR)

- a. RCS pressure and temperature limits for heatup, cooldown, low temperature operation, criticality, and hydrostatic testing as well as heatup and cooldown rates shall be established and documented in the PTLR for the following Technical Specifications (TSs):
1. TS 3.4.3, RCS Pressure and Temperature (P/T) Limits;
 2. TS 3.4.6, RCS Loops - Mode 4;
 3. TS 3.4.7, RCS Loops - Mode 5 Loops Filled;
 4. TS 3.4.11, Pressurizer Safety Valves - Mode 4; and
 5. TS 3.4.13, Low Temperature Overpressure Protection (LTOP) System.
- b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following document:
- CE NPSD-683-A, Revision 6, "Development of a RCS Pressure and Temperature Limits Report for the Removal of P-T Limits and LTOP Requirements from the Technical Specifications," April 2001.
- c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.
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