



*A subsidiary of Pinnacle West Capital Corporation*

Palo Verde Nuclear  
Generating Station

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**ID#: 102-06162-DCM/RAS/GAM**

**April 2, 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 December 23, 2009, Request for Additional Information  
Regarding the Scoping and Screening Audit RAI 2.1-3, Issue (2), for  
the Review of the PVNGS License Renewal Application, and License  
Renewal Application Amendment No. 11**

By letter dated December 23, 2009, the Nuclear Regulatory Commission Staff issued a request for additional information (RAI) related to the PVNGS license renewal application (LRA). With the exception of a response to RAI 2.1-3, Issue (2), Arizona Public Service Company (APS) submitted a response to the December 23, 2009, RAI in letter no. 102-06129, dated February 05, 2010. The response to the December 23, 2009, RAI 2.1-3, Issue (2), is provided in Enclosure 1.

A commitment in this letter is described in the LRA Amendment No. 11 change in Enclosure 2. Should you need further information regarding this submittal, please contact Russell A. Stroud, Licensing Section Leader, at (623) 393-5111.

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

Executed on 4/2/10  
(date)

Sincerely,

*D.C. Mims*

DCM/RAS/GAM

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

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*A138  
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ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Response to December 23, 2009, Request for Additional Information RAI 2.1-3,  
Issue (2), for the Review of the Palo Verde Nuclear Generating Station License  
Renewal Application  
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Enclosures:

1. Response to December 23, 2009, Request for Additional Information  
Regarding the Scoping and Screening Audit RAI 2.1-3, Issue (2), for the  
Review of the PVNGS License Renewal Application
2. Palo Verde Nuclear Generating Station License Renewal Application  
Amendment No. 11

cc: E. E. Collins Jr. NRC Region IV Regional Administrator  
J. R. Hall NRC NRR Project Manager  
L. K. Gibson NRC NRR Project Manager  
R. I. Treadway NRC Senior Resident Inspector for PVNGS  
L. M. Regner NRC License Renewal Project Manager  
G. A. Pick NRC Region IV (electronic)

## **ENCLOSURE 1**

**Response to December 23, 2009, Request for Additional  
Information Regarding the Scoping and Screening Audit  
RAI 2.1-3, Issue (2), for the Review of the PVNGS License  
Renewal Application**

Enclosure 1

**Response to December 23, 2009, Request for Additional Information  
RAI 2.1-3, Issue (2) for the Review of the PVNGS License Renewal Application**

**NRC RAI 2.1-3**

**Background:**

Pursuant to 10 CFR 54.4(a)(2), the applicant must consider all nonsafety-related SSCs, within the scope of license renewal, whose failure could prevent the satisfactory accomplishment of safety-related functions, as described in 10 CFR 54.4(a)(1).

**Issue:**

During the scoping and screening methodology audit, performed on-site October 19-22, 2009, the staff determined that the following nonsafety-related SSCs had not been included within the scope of license renewal:

- (2) Nonsafety-related, abandoned containment spray chemical addition tanks, located in containment along with safety-related SSCs, for which the associated piping had been cut and capped but the tanks had not been verified to be dry. This applies to Units 1 and 3.

**Request:**

The staff requests that the applicant perform a review of these issues and provide the basis for not including nonsafety-related SSCs, attached or adjacent to safety-related SSCs, within the scope of license renewal in accordance with 10 CFR 54.4(a)(2). Indicate if the review concludes that use of the scoping methodology precluded the identification of nonsafety-related SSCs that could interact with safety-related SSCs, and which were not specifically exempted by your CLB, and therefore should have been considered within the scope of license renewal in accordance with 10 CFR 54.4(a)(2). Describe any additional scoping evaluations to be performed to address the (a)(2) criteria. As part of your response, list any additional SSCs included within the scope as a result of your efforts and list those structures and components for which aging management reviews were conducted. For each structure and component, describe the aging management programs, as applicable, to be credited for managing the identified aging effects.

**Enclosure 1**

**Response to December 23, 2009, Request for Additional Information  
RAI 2.1-3, Issue (2) for the Review of the PVNGS License Renewal Application**

**APS Response to RAI 2.1-3, Issue (2)**

The containment spray chemical addition tanks were taken out of service and abandoned in Units 1, 2, and 3. However, a residual amount of fluid containing a diluted solution of the original chemical was identified to be captured in the Units 1 and 3 tanks, and suspected in the associated piping in all three units. The following commitment is being added to LRA Table A4-1, License Renewal Commitments, as shown in Enclosure 2:

By August 30, 2010, APS will ensure that that the abandoned containment spray chemical addition tanks and associated piping components in PVNGS Units 1, 2, and 3 are drained to preclude any spatial interactions with safety related components.

When these actions are completed, the Units 1, 2, and 3 abandoned containment spray chemical addition tanks and the associated piping components will not be within the scope of license renewal.

(Note: The APS responses to RAI 2.1-3, Issues (1), (3), and (4), were provided in APS letter no. 102-06129, dated February 05, 2010.)

**ENCLOSURE 2**

**Palo Verde Nuclear Generating Station  
License Renewal Application Amendment No. 11**

**Palo Verde Nuclear Generating Station  
License Renewal Application  
Amendment No. 11**

**Source: RAI 2.1-03, Issue (2), Response**

**LRA Table A4-1, License Renewal Commitments (page A-59), is revised as follows  
(new text underlined):**

<b>Item No.</b>	<b>Commitment</b>	<b>LRA Section</b>	<b>Implementation Schedule</b>
<u>54</u>	By August 30, 2010, APS will ensure that that the abandoned containment spray chemical addition tanks and associated piping components in PVNGS Units 1, 2, and 3 are drained to preclude any spatial interactions with safety related components. <u>(RCTSAI 3443855)</u>	<u>Response to</u> <u>RAI 2.1-03,</u> <u>Issue (2), in</u> <u>APS letter</u> <u>no. 102-</u> <u>06162, dated</u> <u>4/2/10</u>	<u>8/30/10</u>