



A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear
Generating Station

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102-06243-JHH/AKK/GAM
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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
Revised Commitment Date to Drain the Spray Chemical Addition
Tanks, and License Renewal Application Amendment No. 23**

By letter no. 102-06162, dated April 2, 2010, Arizona Public Service Company (APS) submitted a commitment to ensure that the abandoned containment spray chemical addition tanks (SCATs) and associated piping components in PVNGS Units 1, 2, and 3 are drained to preclude any spatial interactions with safety-related components by August 30, 2010 (Commitment No. 54). The residual fluid in these abandoned components includes dilute hydrazine, a toxic chemical. Careful planning and preparations have been made to safely accomplish the draining, which has taken more time than originally anticipated.

In order to accommodate the safe draining of the SCATs and associated piping components, APS plans to complete the draining by November 30, 2010. Therefore, the PVNGS License Renewal Application (LRA) Commitment No. 54 is being updated, as shown in LRA Amendment No. 23 in Enclosure 1, as follows:

By November 30, 2010, APS will ensure 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.

This commitment is associated with Confirmatory Item 2.1.4.2-1 in the NRC Safety Evaluation Report (SER) with Open Items Related to License Renewal of Palo Verde Nuclear Generating Station, Units 1, 2, and 3, issued on August 6, 2010. The Confirmatory Item states the following:

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

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A138
NRR

SER Section 2.1.4.2 Application of the Scoping Criteria in 10 CFR 54.4(a)(2)


During the scoping and screening methodology audit, performed on-site October 19 - 22, 2009, the staff determined that the nonsafety-related, abandoned containment spray chemical addition tanks in Units 1 and 3 had not been included in the scope of license renewal. The associated piping was cut and capped for these tanks, but they had not been verified to be dry. The tanks were found to contain liquid and thus are in the scope of license renewal under 10 CFR 54.4(a)(2). The applicant responded to the RAI by providing a commitment to drain the tanks by August 30, 2010, which is before issuance of the final SER.

The schedule provided on the NRC reactor license renewal Web site for the Palo Verde license renewal application review shows that the final SER is scheduled to be issued on December 17, 2010. This updated commitment to drain the tanks by November 30, 2010, continues to be before issuance of the final SER.

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

Executed on 8/27/2010
(date)

Sincerely,


for John H. Hesser per e-mail

JHH/RAS/GAM

Enclosure: Palo Verde Nuclear Generating Station License Renewal Application
Amendment No. 23

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

ENCLOSURE 1

Palo Verde Nuclear Generating Station License Renewal Application Amendment No. 23

LRA Section	Affected Page Nos.	RAI No.
Table A4-1, Item No. 54	A-59	na

**Palo Verde Nuclear Generating Station
License Renewal Application
Amendment No. 23**

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

Item No.	Commitment	LRA Section	Implementation Schedule
54	By August 30 <u>November 30</u> , 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. (RCTSAI 3443855)	Response to RAI 2.1-03, Issue (2), in APS letter no. 102-0616206243, dated 4/2/10 8/27/10	8/30/10 <u>11/30/10</u>