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10 CFR 50.54(f)

Palo Verde Nuclear
Generating Station

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102-06368-DCM/DLK
June 10, 2011

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

Dear Sir or Madam:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528, 50-529, and 50-530
30-Day Response to NRC Bulletin 2011-01, Mitigating Strategies**

Pursuant to 10 CFR 50.54(f), this letter provides the Arizona Public Service Company 30-day response to NRC Bulletin 2011-01, "Mitigating Strategies," dated May 11, 2011. The bulletin was issued to confirm continued compliance with 10 CFR 50.54(hh)(2) and request information regarding the mitigation strategies program.

The NRC identified the following three objectives:

1. To require that addressees provide a comprehensive verification of their compliance with the regulatory requirements of Title 10 of the Code of Federal Regulations (10 CFR) Section 50.54(hh)(2),
2. To notify addressees about the NRC staff's need for information associated with licensee mitigating strategies under 10 CFR 50.54(hh)(2) in light of the recent events at Japan's Fukushima Daiichi facility in order to determine if 1) additional assessment of program implementation is needed, 2) the current inspection program should be enhanced, or 3) further regulatory action is warranted, and
3. To require that addressees provide a written response to the NRC in accordance with 10 CFR 50.54(f).

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NRC Bulletin 2011-01 requested that licensees submit a response to questions to confirm continued compliance with 10 CFR 50.54(hh)(2) within 30 days, and requested licensees to provide information regarding mitigation strategies programs required by 10 CFR 50.54(hh)(2) within 60 days. Arizona Public Service Company's 30-day response is provided in the attachment.

This response is submitted in accordance with 10 CFR 50.4.

No commitments are being made to the NRC by this letter.

Should you need further information regarding this response, please contact Marianne N. Webb, Compliance Section Leader, at (623) 393-5730.

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

Executed on 6/20/11
(Date)

Sincerely,
D.C. Minnie

DCM/MNW/DLK/gt

Attachment: 30-Day Response to NRC Bulletin 2011-01

cc:

E. E. Collins Jr.	NRC Region IV Regional Administrator
L. K. Gibson	NRC NRR Project Manager for PVNGS
J. R. Hall	NRC NRR Senior Project Manager
M. A. Brown	NRC Senior Resident Inspector for PVNGS

The NRC has requested the following information:

In order to confirm continued compliance with 10 CFR 50.54(hh)(2), within 30 days of the date of this bulletin, the NRC requests that licensees provide the following information on their mitigating strategies programs.

NRC Request 1

Is the equipment necessary to execute the mitigating strategies, as described in your submittals to the NRC, available and capable of performing its intended function?

Arizona Public Service Company's (APS) Response to NRC Request 1

APS inspected and inventoried the equipment necessary to implement the mitigating strategies as described in our submittals to the NRC (References 1 through 6) and as reviewed and approved by the NRC (Reference 7). APS verified the equipment was available and capable of performing its intended function. In addition, the pumper fire truck required for some of the strategies was tested to ensure it was capable of performing its intended function with respect to the mitigation strategies. Letters of Agreement/Memorandums of Understanding with offsite organizations were also re-validated and/or re-issued, as appropriate.

NRC Request 2

Are the guidance and strategies implemented capable of being executed considering the current configuration of your facility and current staffing and skill levels of the staff?

APS's Response to NRC Request 2

Federal Regulation 10 CFR 50.54(hh)(2) requires licensees to implement guidance and strategies under the circumstances associated with loss of large areas of the plant due to explosions or fire, in the following areas:

- 1) Fire fighting,
- 2) Operations to mitigate fuel damage, and
- 3) Actions to minimize radiological release.

APS has confirmed that the mitigating strategies associated with a loss of large area due to fires or explosions are capable of being executed at the Palo Verde Nuclear Generating Station considering the current configuration of the facility and current staffing and skill level of Palo Verde personnel.

References

1. APS Letter from G. R. Overbeck to USNRC, "Response to NRC Guidance Regarding Mitigation Strategies," (Letter #102-05274, dated May 25, 2005)
2. APS Letter from J. M. Levine to USNRC, "Request for Additional Information Regarding Mitigation Strategies B.5.b," (Letter #102-05357, dated October 13, 2005)
3. APS Letter from J. M. Levine to USNRC, "APS Response to NRC Inspection Report 05000528/2005014; 05000529/2005014; 05000530/2005014," (Letter #102-05426, dated March 07, 2006)
4. APS Letter from J. M. Levine to USNRC, "Supplement Response to NRC Inspection Report 05000528/2005014; 05000529/2005014; 05000530/2005014," (Letter #102-05501, dated May 24, 2006)
5. APS Letter from J. M. Levine to USNRC, "Response Providing Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies," (Letter #102-05627, dated January 11, 2007)
6. APS Letter from D. C. Mims to USNRC, "Supplemental Response Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies," (Letter #102-05708, dated June 07, 2007)
7. NRC Letter from M. T. Markley to Randall K. Edington, "Palo Verde Nuclear Generating Station, Units 1, 2, and 3 - Conforming License Amendments to Incorporate the Mitigation Strategies Required by Section B.5.b. of Commission Order EA-02-026 (TAC Nos. MD4552, MD4553, and MD4554)," dated August 02, 2007