



A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear
Generating Station

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102-06530-DCM/MAM/TLC
June 8, 2012

U.S. Nuclear Regulatory Commission
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- References:
1. NRC Letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012
 2. NRC Letter, Endorsement of Nuclear Energy Institute (NEI) 12-07, "Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features," dated May 31, 2012

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528, 50-529, and 50-530
90-Day Response to Flooding Information Requested by NRC Letter,
Request for Information Pursuant to Title 10 of the Code of Federal
Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3,
of the Near-Term Task Force Review of Insights from the Fukushima
Dai-ichi Accident, dated March 12, 2012**

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff issued a 10 CFR 50.54(f) letter to Arizona Public Service (APS) (Reference 1). Enclosure 4 of Reference 1 contains specific Requested Actions, Requested Information, and Required Responses associated with Recommendation 2.3 for Flooding Walkdowns. This letter provides the APS 90 day response to Reference 1 for PVNGS.

For flooding recommendation 2.3 (walkdowns), Enclosure 4 of Reference 1 states that each licensee is to confirm that it will use the NRC-endorsed flooding walkdown procedure or provide a description of the process it will use.

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NRC

June 8, 2012

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90 Day Response to 10 CFR 50.54(f) Letter Regarding Flooding Recommendation 2.3

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APS confirms that it will use the flooding walkdown procedure, NEI 12-07, *Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features*, endorsed by Reference 2, as the basis for the flooding walkdowns at PVNGS.

APS plans to comply with the response timeline in Enclosure 4 of Reference 1. Specifically, APS will submit a report documenting the results of its flooding design basis walkdowns at PVNGS on November 27, 2012, which corresponds to 180 days after NRC endorsement of the generic guidance.

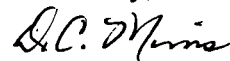
No commitments are being made to the NRC by this letter.

Should you have any questions concerning the content of this letter, please contact Mark McGhee, Operations Support Manager, Regulatory Affairs, at (623) 393-4972.

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

Executed on 6/8/12
(Date)

Sincerely,



DCM/MAM/TLC/hsc

cc:	E. J. Leeds,	NRC Director, Office of Nuclear Reactor Regulation
	E. E. Collins Jr.	NRC Region IV Regional Administrator
	B. K. Singal	NRC NRR Project Manager for PVNGS
	L. K. Gibson	NRC NRR Project Manager
	J. R. Hall	NRC NRR Senior Project Manager
	M. A. Brown	NRC Senior Resident Inspector for PVNGS