



A subsidiary of Pinnacle West Capital Corporation

10 CFR 50.54(f)

Palo Verde Nuclear
Generating Station

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102-06546-DCM/MAM/DLK
July 10, 2012

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

- 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 Electric Power Research Institute (EPRI) Draft Report 1025286, "Seismic Walkdown Guidance,"* dated May 31, 2012

Dear Sir:

**Subject: Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2, and 3
Docket Nos. STN 50-528, STN 50-529, and STN 50-530
Arizona Public Service Company's (APS) 120-Day Response to NRC
Request for Information Pursuant to 10 CFR 50.54(f) Regarding the
Seismic Aspects of Recommendation 2.3 of the Near-Term Task
Force Review of Insights from the Fukushima Dai-ichi Accident**

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Reference 1 to APS. Enclosure 3 of Reference 1 contains specific Requested Actions, Requested Information, and Required Responses associated with Recommendation 2.3 for Seismic. This letter provides APS's 120-day response to Reference 1 for Seismic Recommendation 2.3 for PVNGS.

For Seismic Recommendation 2.3 (walkdowns), Enclosure 3 of Reference 1 states that each licensee will confirm that they intend to use the NRC-endorsed seismic walkdown procedure or provide to the NRC a description of the process that will be used to conduct the walkdowns and develop the needed information.

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120-Day Response to 10 CFR 50.54(f) Letter Regarding Recommendations 2.3

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APS confirms that it will use the seismic walkdown guidance (EPRI 1025286, "Seismic Walkdown Guidance: For Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic") as endorsed by Reference 2 to conduct the walkdowns and develop the needed information at PVNGS.

This letter contains no new regulatory commitments.

Should you have any questions regarding 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 7/10/12
(Date)

Sincerely,

A.C. Mina

DCM/MAM/DLK/hsc

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