



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 11, 2012

Mr. Randall K. Edington
Executive Vice President Nuclear/
Chief Nuclear Officer
Mail Station 7602
Arizona Public Service Company
P.O. Box 52034
Phoenix, AZ 85072-2034

**SUBJECT: PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3 -
REQUEST FOR ADDITIONAL INFORMATION REGARDING LICENSE
AMENDMENT REQUEST TO ELIMATE THE USE OF THE TERM CORE
ALTERATION (TAC NOS. ME8160, ME8161, AND ME8162)**

Dear Mr. Edington:

By letter dated March 8, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12076A045), Arizona Public Service Company (APS, the licensee) submitted a license amendment (LAR) for Palo Verde Nuclear Generating Station, Units 1, 2, and 3. The proposed amendment would eliminate the use of the term CORE ALTERATION from the Technical Specifications.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the information provided by the licensee and determined that the additional information identified in the enclosure to this letter is needed in order for the NRC staff to complete its review. The draft copy of the request for additional information was provided to Mr. Robert Roehler of your staff via e-mail on September 4, 2012. Mr. Roehler agreed to provide a response to the request for additional information within 30 days of the date of this letter.

R. Edington

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If you have any questions, please contact me at (301) 415-1056 or via e-mail at Lauren.Gibson@nrc.gov.

Sincerely,

A handwritten signature in black ink that reads "Lauren K. Gibson". The signature is written in a cursive, flowing style.

Lauren K. Gibson, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-528, STN 50-529,
and STN 50-530

Enclosure:
As stated

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST
TO ELIMINATE THE USE OF THE TERM CORE ALTERATION
IN THE TECHNICAL SPECIFICATIONS
ARIZONA PUBLIC SERVICE COMPANY
PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3
DOCKET NOS. 50-528, 50-529, AND 50-530

By letter dated March 8, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12076A045), Arizona Public Service Company (APS, the licensee) submitted a license amendment (LAR) for Palo Verde Nuclear Generating Station, Units 1, 2, and 3. The proposed amendment would eliminate the use of the term CORE ALTERATION in the Technical Specifications.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the submitted information and determined that the following information is needed for the staff to complete its evaluation:

1. The proposed REQUIRED ACTION A.1 of TS 3.9.2 states that with one startup range monitor (SRM) inoperable, the operator is required to suspend positive reactivity additions. This REQUIRED ACTION is inconsistent with guidance in TS 3.9.2 of NUREG-1432, Revision 4, "Standard Technical Specifications, Combustion Engineering," April 2012 (STS) (ADAMS Accession No. ML12102A165). For Condition A of TS 3.9.2 of the STS, the REQUIRED ACTION states that if one required SRM is inoperable, the operators are required to suspend immediately: (A.1) positive reactivity additions, and (A.2) introduction of coolant into the reactor coolant system (RCS) with boron concentration less than required to meet the minimum boron concentration of limiting condition for operation (LCO) 3.9.1.

The proposed TS 3.9.2 does not adopt REQUIRED ACTION A.2 as stated above. Suspending introduction of coolant inventory from sources that have a boron concentration less than that what would be required in the RCS for minimum refueling boron concentration could prevent the boron dilution event from occurring.

Please address the acceptability of the proposed TS 3.9.2 without inclusion of the REQUIRED ACTION A.2 specified in STS 3.9.2. In particular, please explain what is captured by "suspend positive reactivity additions" for Palo Verde.

Enclosure

R. Edington

- 2 -

If you have any questions, please contact me at (301) 415-1056 or via e-mail at Lauren.Gibson@nrc.gov.

Sincerely,

/RA/

Lauren K. Gibson, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-528, STN 50-529,
and STN 50-530

Enclosure:
As stated

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ADAMS Accession No. ML12250A720

*via email

OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	NRR/DSS/SRXB	NRR/LPL4/BC	NRR/LPL4/PM
NAME	LKGibson	JBurkhardt	SSun*	MMarkley (JSebrosky for)	LKGibson
DATE	9/11/12	9/11/12	6/14/12	9/11/12	9/11/12

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