



102-06652-DCM/MAM/TLC
January 29, 2013

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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, Accession No. ML12073A348
 2. NRC Japan Lessons-Learned Project Directorate, JLD-ISG-2012-05, *Guidance for Performing the Integrated Assessment for External Flooding, Interim Staff Guidance, Revision 0*, dated November 30, 2012, Accession No. ML12311A214
 3. NRC Letter, D.L. Skeen (NRC) to J.E. Pollock (NEI), *Trigger Conditions for Performing an Integrated Assessment and Due Date for Response*, dated December 3, 2012, Accession No. ML12326A912

Dear Sirs:

Subject: **Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528, 50-529, and 50-530
APS Response to March 12, 2012, Request for Information Enclosure
2, Recommendation 2.1, Flooding, Required Response 1, Integrated
Assessment Approach**

On March 12, 2012, the U. S. Nuclear Regulatory Commission (NRC) issued Reference 1 to request information associated with Near-Term Task Force (NTTF) Recommendation 2.1 for Flooding. One of the Required Responses in this letter directed licensees to submit an approach for developing an Integrated Assessment Report, including criteria for identifying vulnerabilities, within 60 days after issue of the NRC's guidance on the subject (Reference 2). The following is Arizona Public Service Company's (APS) 60-day response.

On November 30, 2012, the NRC issued the Reference 2 Interim Staff Guidance. APS will use the Reference 2 guidance for developing the NTTF 2.1 Flooding Integrated Assessment Report for PVNGS Units 1, 2, and 3, if the reevaluated flooding hazard is not bounded by the current design basis flooding evaluation.

APS also will use the guidance provided by Reference 3 regarding the trigger conditions and scope of any required Integrated Assessment.

ADOL
NRC

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Flooding Integrated Assessment Approach for NTTF Recommendation 2.1
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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 1/29/13
(Date)

Sincerely,
A. C. Morris

DCM/MAM/TLC/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
	G. E. Miller	NRR/JLD/JPMB