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102-06756-DCM/RKR/CJS
August 30, 2013

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

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528, 50-529, and 50-530
Revision to NRC Commitment for Generic Letter (GL)
2004-02 Supplemental Response**

In letter number 102-06701, dated May 16, 2013 [Agencywide Documents Access and Management System (ADAMS) Accession No. ML13142A034], Arizona Public Service Company (APS) provided information regarding resolution of Generic Safety Issue (GSI) 191, *Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance*. The letter stated that APS had selected Option 2A (Deterministic), *Mitigative Measures and Alternate Methods Approach*, from SECY-12-0093 and provided a description of the existing mitigative measures and a schedule for remaining actions that supported the expected time frame for resolution of GSI 191. The schedule of actions included submittal to the NRC of a revision of the APS Supplemental Response to GL 2004-02 by August 30, 2013.

During the course of the final APS internal review of the draft Revision 2 to the GL 2004-02 Supplemental Response, additional comments were identified that required changes to the calculations. APS, therefore, plans to revise the relevant supporting calculations and submit Revision 2 to the APS GL 2004-02 Supplemental Response by December 18, 2013.

The additional time for the submittal is justified since PVNGS is a low fiber plant with current values for the in-vessel effects that fall below the limit defined in WCAP-16793, Revision 2 (i.e., 15 grams of fiber per fuel assembly).

ALL
NRC

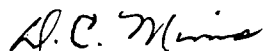
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In addition, there are other significant activities that are being addressed at PVNGS in this same time frame. These other activities include the Unit 3 refueling outage scheduled to begin October 5, 2013, and the NRC Component Design Bases Inspection scheduled in October and November of this year. The engineering resources that will revise the relevant supporting calculations for Revision 2 to the Supplemental Response to GL 2004-02 also support these other activities.

The planned Revision 2 to the APS GL 2004-02 Supplemental Response is comprehensive and will supersede earlier submittals. This letter modifies the commitment made in APS letter number 102-06701, as described in the Enclosure.

Should you need further information regarding this response, please contact Robert K. Roehler, Licensing Section Leader, at (623) 393-5241.

Sincerely,



DCM/RKR/CJS/hsc

Enclosure: APS Changed Commitment

cc: S. A. Reynolds NRC Region IV Regional Administrator
J. K. Rankin NRC NRR Project Manager [electronic and hard copy]
J. A. Reynoso NRC Senior Resident Inspector for PVNGS

Enclosure

APS Changed Commitment

APS Changed Commitment

APS makes the following commitments with regard to the resolution of Generic Safety Issue (GSI) 191 and NRC Generic Letter NRC 2004-02, *Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors*, (ADAMS Accession number ML090830334).

The first commitment date is modified from the original commitment made in APS letter number 102-06701, dated May 16, 2013 (ADAMS Accession No. ML13142A034). The second commitment is re-stated, unchanged from APS letter number 102-06701, for completeness.

	APS Commitments	Completion Date
1	APS currently plans to provide a revised Supplemental Response to NRC Generic Letter 2004-02 to the NRC staff by December 18, 2013, that updates the response to address operating experience in the intervening period, including on-going validation efforts related to containment coatings.	December 18, 2013
2	APS is participating in the PWROG program for establishing revised in-vessel debris limits. It is expected that a topical report (e.g., WCAP) will be submitted for NRC review and approval after testing is completed. APS expects to resolve GSI-191 and GL 2004-02 for PVNGS after NRC issuance of the final safety evaluation for the topical report. APS will develop a plan for demonstrating compliance with the revised PWROG program limits and communicate that plan to the NRC within 60 days of the final NRC safety evaluation for the topical report.	60-days following NRC issuance of final safety evaluation for PWR Owners Group topical report