



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

July 29, 2014

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 -
RELAXATION OF RESPONSE DUE DATES REGARDING FLOODING HAZARD
REEVALUATIONS FOR RECOMMENDATION 2.1 OF THE NEAR-TERM TASK
FORCE REVIEW OF THE INSIGHTS FROM THE FUKUSHIMA DAI-ICHI
ACCIDENT (TAC NOS. MF3634, MF3635, AND MF3636)

Dear Mr. Edington:

By letter dated March 12, 2012,¹ the U.S. Nuclear Regulatory Commission (NRC) issued a request for information to power reactor licensees and holders of construction permits in active or deferred status under Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (hence referred to as the 50.54(f) letter). The NRC issued the request as a part of implementing lessons-learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 2 to the 50.54(f) letter asked licensees to reevaluate all external flooding hazards using present-day guidance and methodologies.

By letter dated May 11, 2012,² the NRC issued a prioritization of due dates for responses from all sites. For Palo Verde Nuclear Generating Station (PVNGS), Units 1, 2, and 3, the NRC set the flooding hazard reevaluation report (FHRR) due date for March 12, 2014.

By letter dated March 10, 2014,³ the Arizona Public Service Company (APS or the licensee) requested that the NRC extend the PVNGS FHRR due date to December 12, 2014. To justify the extension request, APS stated that continuing external validation and review of the current results are necessary to provide a complete FHRR that affords the maximum safety and regulatory benefit.

By letter dated April 24, 2014,⁴ APS supplemented the extension request to include additional details on the schedule of activities for completing the flooding hazard reevaluation. On May 14, 2014,⁵ the NRC staff held a publicly available conference call with APS to discuss the

¹ The 50.54(f) letter is available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML12053A340.

² The prioritization letter is available in ADAMS under Accession No. ML12097A509.

³ The extension request from APS is available in ADAMS under Accession No. ML14076A074.

⁴ The supplemental letter is available in ADAMS under Accession No. ML14118A364.

⁵ A meeting summary is available in ADAMS under Accession No. ML14136A058.

requested extension. By letter dated May 30, 2014,⁶ APS provided additional information supporting its extension request.

The NRC reviewed the justification provided and considered the following factors when reviewing the new schedule:

- The March 10, 2014 letter stated that storm surge, seiche, tsunami, ice effects, and channel diversion screened out as flood hazards in the current licensing basis and previously submitted walkdown report dated, November 27, 2012.⁷
- As documented in the May 14, 2014, meeting summary, APS requested additional time to complete verification and validation of modeling results associated with local intense precipitation (LIP) and associated site drainage.
- The May 30, 2014 letter stated that the APS evaluation completed for LIP as part of an initial analysis is conservative. These results indicate that internal water levels are within the original design basis for internal flooding.

Given these considerations, the NRC considers the revised schedule proposed by APS to be acceptable. Accordingly, and based upon the authority granted to the Director of the Office of Nuclear Reactor Regulation, the revised required response date for submitting the FHRR is December 12, 2014.

If you have any questions regarding this matter, please contact your NRC project manager, Mr. Balwant Singal by phone at (301) 415-3016 or by email at Balwant.Singal@nrc.gov.

Sincerely,



Daniel H. Dorman, Acting Director
Office of Nuclear Reactor Regulation

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

cc: Listserv

⁶ The May 30, 2014, letter is available in ADAMS under Accession No. ML14156A406.

⁷ The November 27, 2012, letter is available in ADAMS under Accession No. ML12341A319.

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Sincerely,
/RA by Jennifer Uhle for/
 Daniel H. Dorman, Acting Director
 Office of Nuclear Reactor Regulation

Docket Nos. 50-528, 50-529, and 50-530
 cc: Listserv

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