



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

July 7, 2015

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

SUBJECT: NUCLEAR REGULATORY COMMISSION PLAN FOR THE AUDIT ARIZONA PUBLIC SERVICE COMPANY'S FLOOD HAZARD REEVALUATION REPORT SUBMITTAL RELATING TO THE NEAR-TERM TASK FORCE RECOMMENDATION 2.1-FLOODING FOR PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3 (TAC NOS. MF5546, MF5547 AND MF5548)

Dear Mr. Edington:

This letter documents the U.S. Nuclear Regulatory Commission (NRC) staff's plan to perform a regulatory audit of Arizona Public Service Company's (the licensee) supporting calculations for the Flood Hazard Reevaluation Report (FHRR) submittal related to the Near-Term Task Force Recommendation 2.1, Flooding for Palo Verde Nuclear Generating Station, Units 1, 2, and 3 (Palo Verde). This technical audit will be performed consistent with NRC Office of Nuclear Reactor Regulation, Office Instruction LIC-111, "Regulatory Audits," dated December 29, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML082900195). The audit will be conducted over multiple sessions, as needed, and the NRC staff will develop an audit summary report to document its observations and conclusions within 90 days of the final audit session.

The audit will provide the NRC staff with a better understanding of the Palo Verde FHRR which was submitted on December 12, 2014 (ADAMS Accession No. ML14350A466). Specifically, the audit will provide the NRC staff with a better understanding of the analyses of the flooding hazards presented in the Palo Verde FHRR. The audit is intended to support completion of the staff's review of the FHRR and the subsequent issuance of a Staff Assessment.

The enclosed audit plan outlines the process that will allow the NRC staff to identify additional information potentially necessary for licensees to supplement their FHRRs, and resolve potential technical concerns. The details of this audit have been discussed with Mr. Mike Crowthers of your staff.

R. Edington

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If you have any questions, please contact me at (301) 415-3809 or by e-mail at Juan.Uribe@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "for Juan Uribe". The signature is fluid and cursive, with a long horizontal stroke at the end.

Juan F. Uribe, Project Manager
Hazards Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

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

Enclosure:
Audit Plan

cc w/encl: Distribution via Listserv

NRC PLAN FOR THE AUDIT OF ARIZONA PUBLIC SERVICE COMPANY'S FLOOD HAZARD
REEVALUATION REPORT SUBMITTAL RELATING TO THE NEAR-TERM TASK FORCE
RECOMMENDATION 2.1-FLOODING FOR PALO VERDE NUCLEAR GENERATING
STATION, UNITS 1, 2, AND 3

BACKGROUND AND AUDIT BASIS

By letter dated March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued a request for information to all power reactor licensees and holders of construction permits in active or deferred status, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) "Conditions of license" (hereafter referred to as the "50.54(f) letter"). The request was issued in connection with implementing lessons-learned from the 2011 accident at the Fukushima Dai-ichi nuclear power plant, as documented in The Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident. Recommendation 2.1 of that document recommended that the staff issue orders to all licensees to reevaluate seismic and flooding for their sites against current NRC requirements and guidance. Subsequent Staff Requirements Memoranda associated with Commission Papers SECY 11-0124 and SECY-11-0137, instructed the NRC staff to issue requests for information to licensees pursuant to 10 CFR 50.54(f).

By letter dated December 12, 2014, Arizona Public Service Company (APS, the licensee) submitted its Flood Hazard Reevaluation Report (FHRR) for Palo Verde Nuclear Generating Station, Units 1, 2, and 3 (Palo Verde) (Agencywide Documents Access and Management System Accession No. ML14350A466). The NRC staff has begun its review of the aforementioned submittals and plans to conduct a regulatory audit of APS to aid in its review of the licensee's FHRR.

REGULATORY AUDIT SCOPE AND METHODOLOGY

The areas of focus for the regulatory audit is the information contained in the Palo Verde FHRR submittal, and all associated and relevant supporting documentation used in the development of the aforementioned document including, but not limited to, methodology, process information, calculations, computer models, etc. The audit will be conducted and completed over several meetings that are to be determined, as necessary.

Enclosure

INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

The information required for the audit is the licensee's models and supporting calculations, as well as documentation related to the storm surge and site specific probable maximum precipitation analyses. Other information needs will be discussed as audit meetings are scheduled.

NRC AUDIT TEAM

Title	Team Member	Affiliation
Team Leader, NRR/JLD	Juan Uribe	NRC
Branch Chief, NRO/DSEA	Chris Cook	NRC
Technical Lead	Mike Lee	NRC
Technical Manager	Laura Quinn-Willingham	NRC
Technical Support	Various Contractors	Department of Energy National Laboratory

LOGISTICS

The audit meetings will be coordinated with APS staff.

DELIVERABLES

The NRC team will develop an audit summary report to convey the audit results. The report will be placed in ADAMS within 90 days of the completion of the final audit session, and will be publicly available.

The information discussed in the audit may be included, fully or in part, in the development of the NRC technical staff's assessments as a result of the FHRR review.

R. Edington

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If you have any questions, please contact me at (301) 415-3809 or by e-mail at Juan.Uribe@nrc.gov.

Sincerely,

/RA by Tekia Govan/

Juan F. Uribe, Project Manager
Hazards Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

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

Enclosure:
Audit Plan

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ADAMS Accession No.: ML15177A149

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