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ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528, 50-529, and 50-530
Industry Initiative to Maintain Severe Accident Management
Guidelines**

The Nuclear Energy Institute (NEI) Nuclear Strategic Issues Advisory Committee (NSIAC) recently approved an Industry Initiative to implement and maintain Severe Accident Management Guidelines (SAMGs). This letter establishes commitments related to SAMGs for the Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2 and 3. These guidelines would be used by emergency response personnel during accident conditions that progress beyond the mitigation capabilities described in Emergency Operating Procedures (EOPs). SAMG strategies are intended to arrest the progression of fuel damage, maintain the capability of the containment as long as possible, and minimize radiological releases.

The new SAMG commitments are listed in the Attachment to this letter. It is expected that NRC staff personnel will conduct periodic inspection of the PVNGS SAMGs and performance deficiencies, if any, will be assessed using the Reactor Oversight Process. We also understand that inspection activities will not extend to NRC review and approval of SAMG strategies, or the use of equipment described in the SAMGs. Should you need further information regarding this submittal, please contact Thomas N. Weber, Nuclear Regulatory Affairs Department Leader, at (623) 393-5764.

Sincerely,

MLL/TNW
Attachment: List of Regulatory Commitments

cc: M. L. Dapas NRC Region IV Regional Administrator
M. M. Watford NRC NRR Project Manager for PVNGS
L. J. Klos NRC NRR Project Manager
C. A. Peabody NRC Senior Resident Inspector for PVNGS

Attachment

List of Regulatory Commitments

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The following table identifies those actions committed to by Arizona Public Service Company (APS) regarding the Palo Verde Nuclear Generating Station (PVNGS), Units 1, 2, and 3, in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	SCHEDULED COMPLETION DATE
<p>APS will consider the Palo Verde Nuclear Generating Station (PVNGS) site Severe Accident Management Guidelines (SAMGs) within the plant configuration management processes in order to ensure that the SAMGs reflect changes made to the facility over time.</p>	<p>October 31, 2016</p>
<p>APS will update the PVNGS site SAMGs to future revisions of the Pressurized Water Reactor Owners Group (PWROG) generic severe accident technical guidelines, and the PVNGS SAMGs will be integrated with other emergency response guideline sets and symptom-based Emergency Operating Procedures, and validated, using the guidance in NEI 14-01, <i>Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents</i>.</p>	<p>Within 2 refueling outages or 3 years of the publication date of the guidelines, whichever is greater</p>