

## Burkhardt, Janet

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**From:** Watford, Margaret  
**Sent:** Monday, January 11, 2016 5:15 PM  
**To:** Carl Stephenson; Del Elkinton; Mike Dilorenzo; Tom Weber  
**Cc:** Klos, John  
**Subject:** DRAFT Unacceptable with Opportunity to Supplement: LAR to Revise TSs to Incorporate Updated Criticality Analysis for Palo Verde, Units 1, 2, and 3 (MF7138, MF7139, and MF7140)

Tom,

By letter dated November 25, 2015, Arizona Public Service Company (APS) submitted a license amendment request to revise its Technical Specifications (TSs) to incorporate updated criticality safety analysis for Palo Verde Nuclear Generating Station, Units 1, 2, and 3. As we discussed on the phone today, NRC has reviewed your application and concluded that the information below is necessary to begin its detailed technical review. A conference call will be scheduled with NRC and your staff to discuss these insufficiencies in detail. Please let me know if Friday, January 15<sup>th</sup> at 10 a.m. EST will work for your staff.

1. In Section 4.3, "Significant Hazards Consideration," the licensee answers "No" to all three questions.
  - a. In Question 1, please explain how the increased complexity of the spent fuel pool storage requirements and the transitional period when two separate sets of requirements will be in place do not result in a significant increase in the probability of a fuel assembly misloading or justify your current answer. While there will be procedures controlling the movement of fuel, the requirements will be more complex indicating the likelihood of an increased probability of a human error in creating the fuel handling move sheets.
  - b. Section 5.6.5 of WCAP 18030-P states, "With the incorporation of SNAP-IN inserts, a new potential accident event is created." However, Question 2 of the Significant Hazards Consideration indicates there is no potential for a new or different accident than was previously analyzed. Please revise the Significant Hazards Consideration or justify the current answer.
2. The requirements for maintaining an adequate interface between different arrays is described in WCAP-18030-P, Section 5.3, "Interface Conditions" are not captured in the proposed technical specifications. Revise the proposed technical specifications to include the interface requirements or justify why interface conditions are not included in the technical specifications.
3. Provide the analysis supporting the modeling of fuel assembly grids and spacers discussed in WCAP-18030-P, Section 5.1.2.3, "Grid and Sleeves."
4. Provide the analysis described in WCAP-18030-P, Section 5.2.3.2, "Storage Array Biases & Uncertainties Results."

Thank you,

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