



102-07459-MLL/TNW
March 10, 2017

U. S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

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Reference: Arizona Public Service Company (APS) letter number 102-07436, *Fourth 10-Year Interval Pump and Valve Inservice Testing Program Relief Requests GRR-01, GRR-02, PRR-01, PRR-02, PRR-03, PRR-04, PRR-05, and PRR-06*, dated February 23, 2017, [Agencywide Documents Access and Management System (ADAMS) Accession Number ML17054D687]

Dear Sirs:

Subject: **Palo Verde Nuclear Generating Station (PVNGS)**
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Supplement Regarding Fourth 10-Year Interval Pump and Valve
Inservice Testing Program Relief Requests PRR-01, PRR-02, PRR-03,
PRR-04, PRR-05, and PRR-06

Pursuant to 10 CFR 50.55a, Arizona Public Service Company (APS) has revised the Palo Verde Nuclear Generating Station (PVNGS) pump and valve inservice testing (IST) program for the fourth 10-year interval for Units 1, 2, and 3, which begins on January 15, 2018. The reference letter transmitted the relief requests considered required for the fourth 10-year interval. In a clarification call with the NRC staff on March 2, 2017, it was recommended that APS supplement the submittal, recognizing that the 2012 Edition of the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code rulemaking for 10 CFR 50.55a has not yet been finalized.

Specifically, APS formally withdraws relief requests GRR-01, and GRR-02 of the reference letter which relate to the use of the 2012 Edition of the ASME OM Code and Code Case OMN-20, *Inservice Test Frequency*, which is an alternative to the frequency specifications of the ASME OM Code. In addition, APS requests that the remaining relief requests of the reference letter be reviewed based upon the existing ASME OM Code of record in 10 CFR 50.55a, which is the 2004 Edition and 2006 Addenda, in lieu of the 2012 Edition. APS has performed a review of the specific relief requests and the proposed change in ASME Code Edition and Addenda is not substantive. APS does, however, intend to send an additional letter indicating plans to use the 2012 Edition for the fourth 10-year IST interval for PVNGS Units 1, 2 and 3, once the 10 CFR 50.55a rulemaking is final and effective. NRC finalization of the 10 CFR 50.55a rulemaking will render relief requests GRR-01 and GRR-02 moot.

APS requests approval of the relief requests prior to the start of the fourth 10-year inservice testing interval which will begin on January 15, 2018.

102-07459-MLL/TNW
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U. S. Nuclear Regulatory Commission
Supplement Regarding Fourth 10 Year Interval Pump and Valve Inservice Testing Program
Relief Requests
Page 2

No new commitments are being made in this submittal.

If you have any questions about this request, please contact Michael D. DiLorenzo at (623) 393-3495.

Sincerely,

Lacal, Maria
L(Z06149)

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cc:	K. M. Kennedy	NRC Region IV Regional Administrator
	S. P. Lingam	NRC NRR Project Manager for PVNGS
	M. M. Watford	NRC NRR Project Manager
	C. A. Peabody	NRC Senior Resident Inspector for PVNGS