NRR-PMDAPEm Resource

From:	Lingam, Siva	
Sent:	Wednesday, March 22, 2017 2:39 PM	
То:	Thomas.N.Weber@aps.com; Michael.Dilorenzo@aps.com	
Cc:	Pascarelli, Robert; Alley, David; Wolfgang, Robert; Bedi, Gurjendra;	
	Carl.Stephenson@aps.com	
Subject:	Palo Verde 1, 2, and 3 - Acceptance Review of Relief Requests PRR-01 through PRR-06 (CAC Nos. MF9321, MF9322, MF9323, MF9314, MF9315, MF9316, MF9317, MF9318, MF9319, MF9324, MF9325, MF9326, MF9331, MF9332, MF9333, MF9327, MF9328, and MF9329)	

By letter dated February 23, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17054D687), as supplemented by letter dated March 10, 2017 (ADAMS Accession No. ML17069A319), Arizona Public Service Company, (the licensee) requested relief from the requirements of the American Society of Mechanical Engineers Operation and Maintenance Code (ASME OM Code) specifically related to fourth 10-year interval pump and valve inservice testing program at Palo Verde Nuclear Generating Station, Units 1, 2, and 3. The licensee submitted the relief requests (RRs) PRR-01, PRR-03, PRR-04, and PRR-05 pursuant to Section 50.55a(z)(2) of Title 10 of the *Code of Federal Regulations*(10 CFR), which requires the applicant to demonstrate that the proposed alternative would be acceptable on the basis that complying with the specified requirement would result in hardship or unusual difficulty, without a compensating increase in the level of quality and safety. Similarly, the licensee submitted RR PRR-02 pursuant to 10 CFR 50.55a(f)(5)(iii) based on impracticality, and RR PRR-06 in accordance with 10 CFR 50.55a(z)(1) based on an acceptable level of quality and safety.

The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed alternative relief requests in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 300 hours to complete. The NRC staff expects to complete this review in approximately 9 months. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager. These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, or unanticipated addition of scope to the review.

If you have any questions, please contact me at (301) 415-1564.

U.S. Nuclear Regulatory Commission Project Manager (NRR/DORL/LPL4-1) Palo Verde Nuclear Generating Station, Units 1, 2, and 3 Grand Gulf Nuclear Station, Unit 1 Location: O8-D5; Mail Stop: O8-B3 Telephone: 301-415-1564; Fax: 301-415-1222 E-mail address: <u>siva.lingam@nrc.gov</u> Hearing Identifier:NRR_PMDAEmail Number:3413

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