

NRR-PMDAPem Resource

From: Lingam, Siva
Sent: Thursday, April 27, 2017 11:15 AM
To: Michael.Dilorenzo@aps.com
Cc: Pascarelli, Robert; Alley, David; Collins, Jay; Thomas.N.Weber@aps.com; Carl.Stephenson@aps.com
Subject: Palo Verde 1, 2, and 3 - Acceptance Review of Relief Request 55 from the Frequency Requirements of ASME Code Case N-729-1 (CAC Nos. MF9592, MF9593, and MF9594)

By letter dated April 7, 2017 (Agencywide Documents Access and Management System Accession No. ML17101A678), Arizona Public service Company (the licensee) submitted a relief request 55 proposing relief from the frequency requirements of American Society of Mechanical Engineers (ASME) Code Case N-729-1 as conditioned by Section 50.55a(g)(6)(ii)(D) of Title 10 of the *Code of Federal Regulations* (10 CFR) for Palo Verde Nuclear Generating Station (PVNGS), Units 1, 2, and 3. Specifically, ASME Code Case N-729-1 as conditioned by 10 CFR 50.55a(g)(6)(ii)(D) requires volumetric and/or surface examination of the reactor vessel closure head (RVCH) penetration nozzles and associated welds no later than nominally 10 calendar years after the RVCH was placed into service. This examination schedule was intended to be conservative and subject to reassessment once additional laboratory data and plant experience on the performance of Alloy 690 and Alloy 52/152 weld metals became available, per ASME Section XI, Code Case N-729. Using plant and laboratory data that has since become available, Electric Power Research Institute Materials Reliability Program (MRP) report MRP-375 was developed to support a technically based volumetric or surface re-examination interval using appropriate analytical tools. This technical basis demonstrates that the re-examination interval can be extended to at least a 20-year interval while maintaining an acceptable level of quality and safety. As a result, the licensee is requesting approval of this alternative to allow the use of an extended inservice inspection interval of 15 years for the PVNGS, Units 1, 2, and 3 Alloy 690/52/152 RVCH penetrations.

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 150 hours to complete. The NRC staff expects to complete this review approximately by December 31, 2017. 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.

Siva P. Lingam
U.S. Nuclear Regulatory Commission
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MESSAGE	4291	4/27/2017 11:15:00 AM

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