



102-07563-MLL/MDD  
August 16, 2017

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U. S. Nuclear Regulatory Commission  
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- Reference 1: 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]
- Reference 2: APS letter number 102-07459, *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*, dated March 10, 2017, (ADAMS Accession Number ML17069A319)

Dear Sirs:

Subject: **Palo Verde Nuclear Generating Station Units 1, 2, and 3  
Docket Nos. STN 50-528/529/530  
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,  
Adoption of 2012 Edition of the American Society of Mechanical  
Engineers Operation and Maintenance Code**

Pursuant to 10 CFR 50.55a, 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. Reference 1 transmitted the relief requests that APS considered required for the fourth 10-year interval.

In Reference 2, APS withdrew relief requests GRR-01, and GRR-02 of Reference 1 which related to the use of the 2012 Edition of the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code and Code Case OMN-20, *Inservice Test Frequency*, which is an alternative to the frequency specifications of the ASME OM Code. This action was due to the 2012 Edition of the ASME OM Code rulemaking for 10 CFR 50.55a not being finalized. In addition, APS requested that the remaining relief requests be reviewed based upon the existing ASME OM Code of record in 10 CFR 50.55a, which was the 2004 Edition and 2006 Addenda, in lieu of the 2012 Edition.

In Federal Register Notice (82FR136), dated July 18, 2017, the relevant final rule was published that incorporated the 2012 Edition of the ASME OM Code into 10 CFR 50.55a, including Code Case OMN-20, with an effective date of August 17, 2017.

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As indicated in References 1 and 2, APS plans to use the 2012 Edition of the OM Code for the fourth 10-year IST interval for PVNGS Units 1, 2 and 3, and hereby requests that the remaining relief requests be reviewed pursuant to the 2012 ASME OM Code. Finalization of the 10 CFR 50.55a rulemaking rendered 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.

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)

Digitally signed by  
Lacal, Maria L(Z06149)  
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MLL/MDD/CJS/sma

cc: K. M. Kennedy  
S. P. Lingam  
M. M. Watford O'Banion  
C. A. Peabody

NRC Region IV Regional Administrator  
NRC NRR Project Manager for PVNGS  
NRC NRR Project Manager  
NRC Senior Resident Inspector for PVNGS