

## NRR-DMPSPeM Resource

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**From:** Lingam, Siva  
**Sent:** Monday, December 11, 2017 1:40 PM  
**To:** Michael.Dilorenzo@aps.com; Matthew.Cox@aps.com  
**Cc:** Pascarelli, Robert; Davis, Robert; Min, Seung; O'Banion (Watford), Margaret; Thomas.N.Weber@aps.com  
**Subject:** Palo Verde, Units 1, 2, and 3 - Acceptance Review of Relief Request 56, Unit 2 Third 10-Year ISI Interval Extension and Use of 2013 Edition of ASME Section XI Code for Fourth 10-Year Interval for Units 1, 2, and 3 (EPID L-2017-LLR-0139)

By letter dated November 10, 2017 (Agencywide Documents Access and Management System Accession No. ML17318A472), Arizona Public Service Company (the licensee) submitted relief request (RR) 56, which seeks an extension to the third 10-year inservice inspection (ISI) interval pursuant to Title 10 of the *Code of Federal Regulations*, Part 50 (10 CFR 50), Section 50.55a(z)(1), "Alternatives to Codes and Standards Requirements," for Palo Verde Nuclear Generating Station (PVNGS), Unit 2. In this RR, the licensee proposed an alternative to the requirements of American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, IWA-2430 for PVNGS, Unit 2. Specifically, the licensee proposed an extension to the third 10-year ISI interval for PVNGS, Unit 2 by approximately 8 months past the Code allowed one year extension (approximately 20 months total extension). The licensee also indicated that the planned third 10-year ISI interval examinations have been completed for Unit 2 and the interval closeout is in progress.

In addition, the licensee proposed an alternative to 10 CFR 50.55a(g)(4)(ii) that would require PVNGS, Units 1, 2, and 3 to use the 2008 Edition of Section XI of the ASME Code, which was in effect 12 months prior to the scheduled start of the respective fourth 10-year ISI intervals for each unit. Specifically, the licensee proposed to utilize the 2013 Edition of Section XI of the ASME Code for all three PVNGS Units for the fourth 10-year ISI interval programs, which was incorporated by reference in the 10 CFR 50.55a rule issued on July 18, 2017 (82 FR [Federal Register] 32934).

The licensee indicated that the relief request is to better align the fourth 10-year ISI intervals and the Code required repair/replacement process with scheduled outages.

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 RR 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 140 hours to complete. The NRC staff expects to complete this review approximately by June 30, 2018, or earlier. 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  
Project Manager (NRR/DORL/LPL4)  
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**Subject:** Palo Verde, Units 1, 2, and 3 - Acceptance Review of Relief Request 56, Unit 2  
Third 10-Year ISI Interval Extension and Use of 2013 Edition of ASME Section XI Code for Fourth  
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