



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 29, 2017

LICENSEE: Arizona Public Service Company

FACILITY: Palo Verde Nuclear Generating Station, Units 1, 2, and 3

SUBJECT: SUMMARY OF DECEMBER 12, 2017, PUBLIC MEETING WITH ARIZONA PUBLIC SERVICE COMPANY, ON PROPOSED RELIEF REQUEST 50 FOR PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3 (EPID L-2017-LRM-0064)

On December 12, 2017, a Category 1 public teleconference was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Arizona Public Service Company (APS or the licensee). The purpose of the meeting was to discuss APS's plans to submit a request for use of an alternative pressure retaining boundary for the system leakage test at Palo Verde Nuclear Generating Station, Units 1, 2, and 3 (PVNGS). The meeting notice and agenda, dated November 30, 2017, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML17345A403. A list of attendees is provided as the Enclosure. The licensee provided slides for this public meeting, which are available in ADAMS at Accession No. ML17345A371.

The licensee presented its plans for its upcoming request, denoted as Relief Request (RR) 50, to use an alternative pressure retaining boundary for the system leakage test for the third 10-year inservice inspection (ISI) interval at PVNGS. The licensee stated that it plans to submit RR 50 in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(2), "Hardship without a compensating increase in quality and safety," based upon the requirements of American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) representing a hardship or unusual difficulty without a compensating increase in the level of quality and safety. The licensee proposes to use ASME Code Case N-798, "Alternative Pressure Testing Requirements for Class 1 Piping between the First and Second Vent, Drain, and Test Isolation Devices, Section XI," and ASME Code Case N-800, "Alternative Pressure Testing Requirements for Class 1 Piping between the First and Second Injection Valves, Section XI," as an alternative to the ASME Code requirements. The licensee clarified that RR 50 will apply to ASME Code Case 1 pressure retaining components that are beyond the first normally closed valve to the second boundary component. In addition, the licensee stated that NRC has authorized similar requests for alternative for the first two 10-year ISI intervals at PVNGS.

On Slide 5 of its presentation, APS provided a table with the scheduling for the third 10-year ISI intervals for each of the units at PVNGS. The NRC is currently reviewing RR 56, which was submitted by APS on November 10, 2017 (ADAMS Accession No. ML17318A472). If RR 56 is approved, it would extend the end of the third 10-year ISI interval for Unit 2 to October 31, 2018. In addition, if the current 10 CFR 50.55a rulemaking to adopt Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," Revision 18 is approved prior to March 17, 2018, or prior to October 31, 2018, if RR 56 is approved, APS would no longer need RR 50 and would withdraw the request. The licensee stated that there is

a typo on the second note on Slide 5. The second note should read: "Should 10 CFR 50.55a rulemaking be effective prior to March 17, 2018, or prior to October 31, 2018 if RR 56 is approved, APS would withdraw RR 50." The licensee stated that it plans to submit RR 50 in December 2017. NRC approval is requested by March 17, 2018, if RR 56 is not approved, or by October 31, 2018, if RR 56 is approved.

The NRC staff queried the licensee about its discussion in RR 56, which states that the "planned third 10-year ISI interval examinations have been completed for [PVNGS] Unit 2 and the interval closeout is in process," in comparison to the licensee's plans to submit RR 50, which requests NRC prior approval for use of an alternative. The licensee indicated that it has performed the system leakage tests in accordance with ASME Code Case N-798 and ASME Code Case N-800.

Members of the public were not in attendance. Public Meeting Feedback forms were not received.

Please direct any inquiries either to me at 301-415-1233 or Margaret.O'Banion@nrc.gov, or to Siva Lingam at 301-415-1564 or Siva.Lingam@nrc.gov.



Margaret W. O'Banion, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-528, 50-529 and 50-530

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES

DECEMBER 12, 2017, MEETING WITH ARIZONA PUBLIC SERVICE COMPANY

REGARDING PROPOSED RELIEF REQUEST 50

PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3

Margaret O'Banion	U.S. Nuclear Regulatory Commission (NRC)
David Alley	NRC
Ali Rezai	NRC
Seung Min	NRC
Siva Lingam	NRC
Geoff Miller	NRC
David You	NRC
Jim Drake	NRC
Michael DiLorenzo	Arizona Public Service Company (APS)
Boris Bolf	APS
Matthew Cox	APS
Keith Jackson	APS
Nawaporn Aaronscooke	APS
Carl Stephenson	APS
Robert Ruttle	APS

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GMiller, RIV
DYou, RIV
JDrake, RIV
JBowen, OEDO

ADAMS Accession Nos.
Meeting Notice ML17345A403
Meeting Summary ML17353A190
Handouts ML17345A371

***via email**

OFFICE	NRR/DORL/LPL4/PM	NRR/DORL/LPL4/LA	NRR/DMLR/MPHB/BC*
NAME	MO'Banion	PBlechman	DAlley
DATE	12/21/2017	12/27/2017	12/20/2017
OFFICE	NRR/DORL/LPL4/BC	NRR/DORL/LPL4/PM	
NAME	RPascarelli (LRegner for)	MO'Banion (SLingam for)	
DATE	12/29/2017	12/29/2017	

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