

## NRR-DMPSPEm Resource

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**From:** Lingam, Siva  
**Sent:** Tuesday, April 10, 2018 11:44 AM  
**To:** Matthew.Cox@aps.com  
**Cc:** Pascarelli, Robert; Ruffin, Steve; Sydnor, Christopher; Thomas.N.Weber@aps.com; Michael.Dilorenzo@aps.com  
**Subject:** Palo Verde Nuclear Generating station, Unit 2 - Acceptance of Relief Request 59, Third 10-Year ISI Interval, Request for Relief from the ASME Code Inspection Item B13.50 Extension (EPID L-2018-LLR-0024)

By letter dated March 9, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18068A660), Arizona Public Service Company (APS, the licensee) submitted relief request (RR)-59, 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)(2), "Hardship Without a Compensating Increase in Quality and Safety," 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, required Category B-N-2 (Item 13.50) visual examination of the reactor pressure vessel (RPV) interior attachments within the belt region for PVNGS, Unit 2. Table IWB-2500-1, examination Category B-N-2, Item Number B13.50, requires a VT-1 visual examination of the accessible interior attachments within the beltline region of the RPV once each 10-year interval. The PVNGS Unit 2 third 10-year ISI interval ended on March 17, 2017, and has been extended by one year in accordance with IWA-2430(d)(1). On March 9, 2018, RR 56 extended the Unit 2 third interval from March 17, 2018 to October 31, 2018 (ADAMS Accession No. ML18067A073).

APS completed the planned 10-year ISI interval examinations for Unit 2 and the interval closeout review was in progress. During the course of the closeout review, a limited number of ISI examinations were identified that were either not included in a previous RR or were not performed during the third ISI interval for Unit 2. Examination Category B-N-2, Item Number B13.50 is one of the missed items, and therefore, VT-1 examination for this item was not included in RR-44. RR-44 that was approved by NRC on August 27, 2010 (ADAMS Accession No. ML102160487), allowed the visual examinations of Categories B-N-2 (B13.60) and B-N-3 (B13.70) RPV interior attachments beyond the beltline region and the core support structure to be performed in 2027 for PVNGS, Unit 2. Based on Westinghouse Owners Group Topical Report, WCAP-16168-NP, Revision 1, "Risk Informed Extension of the Reactor Vessel In-Service Inspection Interval," January 2006 (ADAMS Accession No. ML060330504) that supports a risk-assessment of extensions to the ISI intervals for Category B-A and B-D components, NRC approved RR-40 (ADAMS Accession No. ML100290415), extending the third ISI interval for Category B-A and B-D components from 10 years to 20 years (Unit 2 extended to 2027).

In summary, under RR-59, APS is proposing to perform the next Unit 2 B-N-2, Item B13.50, visual examination in conjunction with the category B-A and B-D volumetric examinations and the Category B-N-2 (B13.60) and B-N-3 (B13.70) visual examinations scheduled in 2027, which falls in the fourth 10-year ISI interval. The B13.50 attachments in Unit 2 are the surveillance capsule holder assembly attachment welds. The surveillance capsule holders are attached to the cladding of the RPV and are not major load-bearing components.

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review for RR 59. 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-59 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 October 31, 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  
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