



102-07803-MDD/MS
November 13, 2018

**Palo Verde
Nuclear Generating Station**
5801 S. Wintersburg Road
Tonopah, AZ 85354

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Reference: Edmond J. Mercier (Westinghouse) to NRC, LTR-NRC-18-59, *Submittal of WCAP-18240-P / WCAP-18240-NP, Revision 0, 'Westinghouse Thermal Design Procedure (WTDP)' (Proprietary / Non-Proprietary)*, dated August 27, 2018 [Agencywide Documents Access and Management System (ADAMS) Accession numbers ML18242A238 and ML18176A040]

Dear Sirs:

Subject: **Palo Verde Nuclear Generating Station Units 1, 2, and 3
Docket Nos. STN 50-528, 50-529, and 50-530
Topical Report WCAP-18240-P / WCAP-18240-NP,
Westinghouse Thermal Design Procedure**

The purpose of this letter is to inform the NRC staff of the Arizona Public Service Company (APS) interest in use of the subject topical report upon approval. The topical report was submitted for review in the reference letter from Westinghouse Corporation. This letter of support for the subject topical report is intended to assist the NRC staff in prioritizing the review of the topical report.

APS encourages the regulatory review and approval of the subject WCAP. Implementing the methods described in the WCAP will provide for a simplified yet conservative analysis of the statistical combination of uncertainties which is needed for every core design to verify the reload design meets the technical specification departure from nucleate boiling ratio (DNBR) limits. Utilizing the WCAP methods applies a more robust and rigorous methodology, removes excess conservatism, and can reduce the likelihood of human performance errors while assuring nuclear safety. Specifically, the WCAP methods:

- provide for Monte Carlo sampling for DNBR limit, and/or Rods-in-DNB statistical convolution for Condition IV events
- use approved thermal hydraulic code and DNB correlations
- can be used with new, approved DNB correlations and transient evaluation methods
- simplify the DNBR limit calculation process to eliminate response surface as an intermediate step
- can be implemented with the VIPRE-W code (WCAP-14565-P-A) and
- allow for elimination of the simplified CETOP-D code to utilize VIPRE-W directly in the setpoints methodology

No new commitments are being made to the NRC by this letter.

A member of the STARS Alliance, LLC

Callaway • Diablo Canyon • Palo Verde • Wolf Creek

102-07803-MDD/MSC
ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Topical Report WCAP-18240-P / WCAP-18240-NP, *Westinghouse Thermal Design
Procedure*
Page 2

Should you need further information regarding this letter, please contact Matthew S. Cox, Licensing Section Leader, at (623) 393-5753.

Sincerely,



Michael D. DiLorenzo
Nuclear Regulatory Affairs Department Leader

MDD/MSC/CJS/sma

cc:	K. M. Kennedy	NRC Region IV Regional Administrator
	M. D. Orenak	NRC NRR Project Manager for PVNGS
	C. A. Peabody	NRC Senior Resident Inspector for PVNGS