



102-07884-MLL/MDD  
March 14, 2019

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

**MARIA L. LACAL**  
Senior Vice President, Nuclear  
Regulatory & Oversight

**Palo Verde**  
**Nuclear Generating Station**  
P.O. Box 52034  
Phoenix, AZ 85072  
Mail Station 7605  
Tel 623.393.6491

Dear Sirs:

Subject: **Palo Verde Nuclear Generating Station Units 1, 2, and 3  
Docket Nos. STN 50-528, 50-529, and 50-530  
Renewed Operating License Nos. NPF-41, NPF-51, NPF-74  
Response to Request for Additional Information - Relief Request 62 -  
Third and Fourth 10-Year Inservice Inspection Intervals, Proposed  
Alternative - Pressurizer Heater Sleeve Repairs**

By letter number 102-07780, dated August 31, 2018 (Agencywide Documents Access and Management System Accession No. ML18243A544), Arizona Public Service Company (APS) submitted relief request (RR) 62 for an alternative to Section XI of the American Society of Mechanical Engineers Code that addressed the repair of pressurizer heater sleeves for Palo Verde Nuclear Generating Station Units 1, 2, and 3.

During the Nuclear Regulatory Commission (NRC) staff review it was determined that additional information is required to complete their review. A clarifying phone call was held between NRC and APS on February 13, 2019, to discuss the additional information needed. The APS response to the Request for Additional Information is provided in the enclosure to this letter.

APS requests authorization of the proposed alternative contained in RR 62 from the time of authorization through the end of the fourth 10-year Inservice Inspection (ISI) intervals for all three units. Additionally, APS requests authorization of the proposed alternative for the remainder of the Unit 1, third 10-year ISI interval which is scheduled to end on May 31, 2019. NRC approval of this relief request is requested prior to the end of the Unit 1 refueling outage 21 which is scheduled to complete on May 4, 2019.

No new commitments are being made in this submittal. If you have any questions about this request, please contact Matthew S. Cox, Licensing Section Leader, at (623) 393-5753.

Sincerely,

MLL/MDD/MSC

102-07884-MLL/MDD

ATTN: Document Control Desk

U. S. Nuclear Regulatory Commission

Response to Request for Additional Information - RR 62, Third and Fourth 10-Year Inservice  
Inspection Intervals, Proposed Alternative - Pressurizer Heater Sleeve Repairs

Page 2

Enclosure: Response to Request for Additional Information - Relief Request 62, Third  
and Fourth 10-Year Inservice Inspection Intervals, Proposed Alternative -  
Pressurizer Heater Sleeve Repairs

cc: S. A. Morris NRC Region IV Regional Administrator  
S. P. Lingam NRC NRR Project Manager for PVNGS  
C. A. Peabody NRC Senior Resident Inspector for PVNGS

**ENCLOSURE**

**Response to Request for Additional Information**

**Relief Request 62**

**Third and Fourth 10-Year Inservice Inspection Intervals,  
Proposed Alternative - Pressurizer Heater Sleeve Repairs**

**Enclosure**

**Response to Request for Additional Information - Relief Request 62  
Third and Fourth 10-Year Inservice Inspection Intervals, Proposed Alternative  
Pressurizer Heater Sleeve Repairs**

10 CFR 50.55a Relief Request Number 62  
Response to Request for Additional Information  
Proposed Alternative in Accordance with 10 CFR 50.55a(z)(1)  
Third and Fourth 10-Year Inservice Inspection (ISI) Interval  
Pressurizer Heater Sleeve Repairs

By letter number 102-07780, dated August 31, 2018 [Agencywide Documents Access and Management System (ADAMS) Accession No. ML18243A544], Arizona Public Service Company (APS), submitted relief request (RR) 62 for an alternative to Section XI of the American Society of Mechanical Engineers Code that addressed the repair of pressurizer heater sleeves for Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2, and 3.

The Nuclear Regulatory Commission (NRC) staff has reviewed RR 62 and determined that additional information is required in order to complete the review. A clarifying phone call was held between NRC and APS on February 13, 2019, to discuss the additional information needed. The APS response is provided after each NRC RAI.

NRC MPHB-RAI-1:

The licensee requested the proposed alternative at PVNGS, Units 1, 2, and 3 for the third and fourth 10-year inservice inspection (ISI) intervals. However, Units 2 and 3 are currently in the fourth 10-year ISI interval and Unit 1 will begin the fourth 10-year ISI interval on June 1, 2019. The licensee has requested its proposed alternative in accordance with Title 10 of the Code of Federal Regulations (10 CFR) Part 50, Section 50.55a(z)(1). However, Section 10 CFR 50.55a(z) states, in part, "A proposed alternative must be submitted and authorized prior to implementation." Therefore, the NRC staff would be unable to approve a proposed alternative, in accordance with 10 CFR 50.55a(z), for the third interval at Units 2 and 3, and all but the remainder of the third interval for Unit 1. The NRC staff requests that the licensee modify the proposed alternative to be consistent with 10 CFR 50.55a(z).

APS Response:

In accordance with 10 CFR 50.55a(z), APS requests authorization of the proposed alternative contained in RR 62 from the time of NRC approval through the end of the fourth 10-year ISI intervals for all three units. The fourth 10-year ISI intervals are currently scheduled as follows:

- Fourth ISI interval for Unit 1 - June 1, 2019 to July 17, 2028
- Fourth ISI interval for Unit 2 - November 1, 2018 to October 31, 2028
- Fourth ISI interval for Unit 3 - June 1, 2018 to January 10, 2028

Additionally, APS requests authorization of the proposed alternative for the remainder of the Unit 1, third 10-year ISI interval which is scheduled to end on May 31, 2019.

**Enclosure**

**Response to Request for Additional Information - Relief Request 62  
Third and Fourth 10-Year Inservice Inspection Intervals, Proposed Alternative  
Pressurizer Heater Sleeve Repairs**

NRC MPHB-RAI-2:

The licensee requested a similar alternative, RR 29, during the second 10-year ISI interval at PVNGS Units 1, 2, and 3. In support of that proposed alternative, the licensee provided Report No. SIR 04 045, Revision 0, "Technical Report Supporting the Palo Verde Pressurizer Heater Sleeve Mid-Wall Repair," June 2004 (ADAMS Accession No. ML042450045). The current proposed alternative references this document to support RR 62. The applicable Code for the second 10-year ISI interval at PVNGS, Units 1, 2 and 3 was the 1992 Edition through the 1992 Addenda of ASME Code Section XI. The applicable Code for the fourth 10-year ISI interval is the 2013 Edition of ASME Code Section XI. Please clarify whether a reconciliation has been performed between these two Editions/Addenda of ASME Code, Section XI, and that any differences between them do not impact the analysis detailed in the above listed Report No. SIR-04-045 in support of RR 62.

APS Response:

APS has performed a reconciliation of the 1992 Edition/Addenda to the 2013 Edition of the ASME Code Section XI for the purpose of determining whether the supporting analysis (Report No. SIR-04-045) continues to meet the applicable requirements of the Code for the analytical evaluation of flaws. There are no differences identified between the 1992 Editions/Addenda and the 2013 Edition that impact the outcome and/or conclusions of the supporting analysis.