From: Lingam, Siva
Sent: Tuesday, March 31, 2020 12:00 PM
To: Matthew.Cox@aps.com
Cc: Dixon-Herrity, Jennifer; Mitchell, Matthew; Honcharik, John; Collins, Jay; Michael.Dilorenzo@aps.com; Thomas.N.Weber@aps.com
Subject: Palo Verde 2 - Acceptance Review of RR 65, Request for Relief from RPV Bottom Mounted Instrumentation Nozzles and a Pressurizer Surge Line Weld Overlay Examination (EPID L-2020-LLR-0045)

By letter dated March 27, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20088A533), as supplemented by letter dated March 30, 2020 (ADAMS Accession No. ML20090L944), Arizona Public Service Company (APS, the licensee) submitted Relief Request (RR) 65 to defer the scheduled inservice inspection (ISI) examinations for the reactor pressure vessel (RPV) bottom mounted instrumentation nozzles and a pressurizer surge line nozzle weld overlay from the currently planned Unit 2 spring of 2020 refueling outage (2R22) to the next refueling outage (2R23) in the fall of 2021 due to the COVID-19 pandemic for Palo Verde Nuclear Generating Station, Unit 2. The licensee requested this alternative per the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI and Code Cases N-722-1, "Additional Examinations for PWR Pressure Retaining Welds in Class 1 Components Fabricated with Alloy 600/82/182 Materials Section XI, Division 1" and N-770-2, "Alternative Examination Requirements and Acceptance Standards for Class 1 PWR Piping and Vessel Nozzle Butt Welds Fabricated With UNS N06082 or UNS W86182 Weld Filler Material With or Without Application of Listed Mitigation Activities Section XI, Division 1," as required by Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a, Codes and Standards." APS requested this RR based on 10 CFR 50.55a(z)(2), "Hardship without a compensating increase in quality and safety."

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review for the above RR 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 160 hours to complete. The NRC staff expects to complete this review approximately by August 31, 2020, 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
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