

From: Lingam, Siva
Sent: Friday, September 17, 2021 3:28 PM
To: Matthew.Cox@aps.com
Cc: Dixon-Herrity, Jennifer; Hsueh, Kevin; Dozier, Jerry; Vasavada, Shilp; Dinh, Thinh; Buford, Angie; Scarbrough, Thomas; Colaccino, Joseph; Ma, John; Wittick, Brian; Chien, Nan; Ashley, Clinton; Wagage, Harry
Subject: RE: Palo Verde 1, 2 and 3 - Acceptance Review of LAR Associated with Permanent Extension of Containment ILRT Frequency to 15 Years (Type A) and CIV Leak Rate Test Frequency to 75 Months (Type C) (EPID L-2021-LLA-0006)

Please note the revised estimated hours (additional 110 hours) due to the following reasons:

- Underestimated the initial estimated hours.
- Added 30 hours by the peer reviewer after the acceptance review was issued to the licensee.
- Training of the entry level engineers.

Thank you.

From: Lingam, Siva
Sent: Monday, February 22, 2021 8:08 AM
To: Matthew.Cox@aps.com
Cc: Dixon-Herrity, Jennifer <Jennifer.Dixon-Herrity@nrc.gov>; Hsueh, Kevin <Kevin.Hsueh@nrc.gov>; Dozier, Jerry <Jerry.Dozier@nrc.gov>; Vasavada, Shilp <Shilp.Vasavada@nrc.gov>; Dinh, Thinh <Thinh.Dinh@nrc.gov>; Buford, Angie <Angela.Buford@nrc.gov>; Scarbrough, Thomas <Thomas.Scarbrough@nrc.gov>; Colaccino, Joseph <Joseph.Colaccino@nrc.gov>; Ma, John <John.Ma@nrc.gov>; Wittick, Brian <Brian.Wittick@nrc.gov>; Chien, Nan <Nan.Chien@nrc.gov>; Ashley, Clinton <Clinton.Ashley@nrc.gov>; Michael.Dilorenzo@aps.com
Subject: Palo Verde 1, 2 and 3 - Acceptance Review of LAR Associated with Permanent Extension of Containment ILRT Frequency to 15 Years (Type A) and CIV Leak Rate Test Frequency to 75 Months (Type C) (EPID L-2021-LLA-0006)

By letter dated January 22, 2021 (Agencywide Documents Access and Management System Accession No. ML21022A408), Arizona Public Service Company (APS) submitted a license amendment request (LAR) to revise the Technical Specifications (TSs) for Palo Verde Nuclear Generating Station, Units 1, 2, and 3 (Palo Verde). Specifically, the proposed change is a request to revise TS 5.5.16, *Containment Leakage Rate Testing Program*, to allow the following:

- Change the existing Type A integrated leakage rate test (ILRT) program test interval to 15 years in accordance with Nuclear Energy Institute (NEI) Topical Report NEI 94-01, *Industry Guideline for Implementing Performance-Based Option of [Title 10 of the Code of Federal Regulations (10 CFR)] 10 CFR 50, Appendix J, [Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors]*, Revision 3-A, and the limitations and conditions specified in NEI 94-01, Revision 2-A.
- Adopt an extension of the containment isolation valve (CIV) leakage rate testing (Type C) frequency from the 60 months currently permitted by 10 CFR 50, Appendix J, Option

B, to 75 months for Type C leakage rate testing of selected components, in accordance with NEI 94-01, Revision 3-A.

- Adopt the use of American National Standards Institute/American Nuclear Society (ANSI/ANS) 56.8-2002, *Containment System Leakage Testing Requirements*.
- Adopt a more conservative allowable test interval extension of nine months, for Type A, Type B and Type C leakage rate tests in accordance with NEI 94-01, Revision 3-A.

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 Palo Verde LAR. 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 LAR 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 ~~450~~ 560 hours to complete. The NRC staff expects to complete this review approximately by January 31, 2022, 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
Palo Verde Nuclear Generating Station, Units 1, 2, and 3
Grand Gulf Nuclear Station
Entergy Fleet
Location: O-9E22; Mail Stop: O-9E03
Telephone: 301-415-1564
E-mail address: Siva.Lingam@nrc.gov

Hearing Identifier: NRR_DRMA
Email Number: 1352

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Received Date: 9/17/2021 3:28:00 PM

From: Lingam, Siva

Created By: Siva.Lingam@nrc.gov

Recipients:

"Dixon-Herrity, Jennifer" <Jennifer.Dixon-Herrity@nrc.gov>

Tracking Status: None

"Hsueh, Kevin" <Kevin.Hsueh@nrc.gov>

Tracking Status: None

"Dozier, Jerry" <Jerry.Dozier@nrc.gov>

Tracking Status: None

"Vasavada, Shilp" <Shilp.Vasavada@nrc.gov>

Tracking Status: None

"Dinh, Thinh" <Thinh.Dinh@nrc.gov>

Tracking Status: None

"Buford, Angie" <Angela.Buford@nrc.gov>

Tracking Status: None

"Scarborough, Thomas" <Thomas.Scarborough@nrc.gov>

Tracking Status: None

"Colaccino, Joseph" <Joseph.Colaccino@nrc.gov>

Tracking Status: None

"Ma, John" <John.Ma@nrc.gov>

Tracking Status: None

"Wittick, Brian" <Brian.Wittick@nrc.gov>

Tracking Status: None

"Chien, Nan" <Nan.Chien@nrc.gov>

Tracking Status: None

"Ashley, Clinton" <Clinton.Ashley@nrc.gov>

Tracking Status: None

"Wagage, Harry" <Harry.Wagage@nrc.gov>

Tracking Status: None

"Matthew.Cox@aps.com" <Matthew.Cox@aps.com>

Tracking Status: None

Post Office: SJ0PR09MB6109.namprd09.prod.outlook.com

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