

**From:** William Orders  
**Sent:** September 4, 2024  
**To:** Michael.Dilorenzo@aps.com  
**Cc:** Jennie Rankin; Angie Buford; John Tsao; James Medoff; Robert Davis; Kaihwa Hsu; Matthew Mitchell;  
**Subject:** Palo Verde Nuclear Generating Station Units 1, 2, and 3  
Relief Request (RR) No. 71: Re-Submittal of RR-30 (L-2024-LLR-0050)

By letter dated July 31, 2024 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24213A323), Arizona Public Service Company (the licensee) requests Nuclear Regulatory Commission (NRC) staff approval of Relief Request No. 71, a proposed alternative to a 10 CFR 50.55a(c), Reactor Coolant Pressure Boundary, American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section III, Code Case parameter. Specifically, APS requests approval of an alternative to ASME Section III, Sub-Section NB-3356, Code Case 1361-2, Socket Welds, Section III, to allow a diametral clearance (cMAX) of 0.062 inch between the replacement pressurizer heater sleeves and the heater sheaths, instead of 0.045 inch as specified in the Code Case. This reactor coolant pressure boundary relief request resubmittal is being tracked by APS as Inservice Inspection (ISI) Program RR-71 and is to renew existing RR-30.

The purpose of this email is to provide the results of the NRC staff's acceptance review for Relief Request No. 71. 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.

Pursuant to Sections 50.55a(z)(1) and 50.55a(z)(2) of Title 10 of the *Code of Federal Regulations* (10 CFR), the licensee shall demonstrate that the proposed relief request would provide an acceptable level of quality and safety, or that compliance with the specified requirements of Section 50.55a would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

The NRC staff has reviewed your application and concluded that it provides 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 Relief Request 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 review will take approximately 142 hours to complete. The NRC staff expects to complete the review of this Relief Request by April 23, 2025, 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. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me at (301) 415-3329 or by email to [William.Orders@nrc.gov](mailto:William.Orders@nrc.gov).

Sincerely,

William T. Orders, Project Manager  
Plant Licensing Branch LPL4  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation