From: William Orders
To: Michael.Dilorenzo@aps.com
Cc: Tony Nakanishi; Angie Buford
Subject: Acceptance Review of RR73
Date: Monday, December 30, 2024 4:10:00 PM
Attachments: DRAFT Acceptance 9 21 24 FINAL.docx

Mike, please find attached the NRC's acceptance review of RR73

From: William Orders
To: Michael.Dilorenzo@aps.com
Cc: Tony Nakanishi; Angie Buford;
Date: December 30, 2024
Subject: Palo Verde Nuclear Generating Station Units 1 Relief Request 73- Proposed Alternative for Pressurizer Lower Shell Temperature Nozzle Life of Repair (EPID L-2024-LLR-0080)

By letter dated December 10, 2024, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24346A110), Arizona Public Service Company (APS, the licensee) requests Nuclear Regulatory Commission (NRC) authorization of Relief Request 73, on the basis that the proposed alternative provides an acceptable level of quality and safety.

Specifically, pursuant to Title 10 of the Code of Federal Regulations (10 CFR) 50.55a, Codes and Standards, paragraph (z)(1), APS requests NRC authorization of Relief Request 73, on the basis that the proposed alternative provides an acceptable level of quality and safety. APS proposes alternatives to American Society of Mechanical Engineers (ASME) Pressure Vessel Code, Section XI, 2013 Edition, and ASME Code Case N-638-10, Similar and Dissimilar Metal Welding Using Ambient Temperature Machine [Gas Tungsten Arc Welding] GTAW Temper Bead Technique, Section XI, Division 1, dated May 6, 2019, for Palo Verde Nuclear Generating Station (PVNGS), Unit 1, as described in the Enclosure to the December 10, 2024 letter.

The purpose of this email is to provide the results of the NRC staff's acceptance review for Request 73-Proposed Alternative for Pressurizer Lower Shell Temperature Nozzle Life of Repair. 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 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 144 hours to complete. The NRC staff expects to complete the review of this Relief Request by April 4, 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.

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

Sincerely,

William T. Orders, Project Manager
Plant Licensing Branch LPL4

Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation