



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

August 31, 2011

Mr. Randall K. Edington  
Executive Vice President Nuclear/  
Chief Nuclear Officer  
Mail Station 7602  
Arizona Public Service Company  
P.O. Box 52034  
Phoenix, AZ 85072-2034

**SUBJECT: PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3 -  
REQUEST FOR ADDITIONAL INFORMATION REGARDING LICENSE  
AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATION 3.7.4,  
"ATMOSPHERIC DUMP VALVES" (TAC NOS. ME6566, ME6567, AND  
ME6568)**

Dear Mr. Edington:

By letter dated June 22, 2011 (Agencywide Documents Access and Management System Accession No. ML11182A908), Arizona Public Service Company, the licensee for Palo Verde Nuclear Generating Station Units 1, 2, and 3, requested a license amendment that would revise Technical Specification Limiting Condition for Operation 3.7.4, "Atmospheric Dump Valves (ADV)." The proposed change would require four ADV lines to be operable in MODES 1, 2, and 3, as well as MODE 4 when a steam generator is relied upon for heat removal.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the information provided by the licensee and determined that the additional information identified in the enclosure to this letter is needed in order for the NRC staff to complete its review. The draft copy of the request for additional information was provided to Mr. Russell Stroud of your staff via e-mail on Friday, August 26, 2011. A conference call to clarify the requests for additional information was held with Mr. Tom Weber and other members of your staff on August 31, 2011. During that call, Mr. Weber agreed to provide a response to the requests for additional information by December 9, 2011.

R.Edington

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If you have any questions, please contact me at (301) 415-1056 or via e-mail at [Lauren.Gibson@nrc.gov](mailto:Lauren.Gibson@nrc.gov).

Sincerely,

A handwritten signature in black ink that reads "Lauren Kate Gibson". The script is cursive and fluid, with the first letters of each name being capitalized and prominent.

Lauren K. Gibson, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-528, STN 50-529,  
and STN 50-530

Enclosure:  
As stated

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

PALO VERDE NUCLEAR GENERATING STATION

LICENSE AMENDMENT REQUEST CONCERNING TECHNICAL SPECIFICATION 3.7.4

ATMOSPHERIC DUMP VALVES

TAC NOS. ME6566, ME6567, ME6568

By letter dated June 22, 2011, Arizona Public Service Company, the licensee for Palo Verde Nuclear Generating Station Units 1, 2, and 3, requested a license amendment that would revise Technical Specification Limiting Condition for Operation (LCO) 3.7.4, Atmospheric Dump Valves (ADV).

In order to complete the review, the staff requests the following additional information.

1. Please provide the technical basis, including a discussion of defense in depth and safety margins, for:
  - a. Proposed LCO 3.7.4, Condition A, Completion Time of 7 days
  - b. Proposed LCO 3.7.4, Condition B, Completion Time of 24 hours.
2. Regarding the design-basis events for which ADVs are required, and which require the consideration of loss of offsite power, please explain how the main steam condenser provides defense in depth to the ADV safety and design functions.
3. Discuss the impact that local manual ADV operation or maintaining steam generator pressure with main steam safety valves would have on safety margin for design-basis events, including but not necessarily limited to:
  - a. Postulated loss-of-coolant accidents
  - b. Natural circulation cooldown as described in Generic Letter 81-21
  - c. Steam generator tube rupture events
  - d. Main steam and feedwater line breaks

Enclosure

R. Edington

-2-

If you have any questions, please contact me at (301) 415-1056 or via e-mail at [Lauren.Gibson@nrc.gov](mailto:Lauren.Gibson@nrc.gov).

Sincerely,

/RA/

Lauren K. Gibson, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-528, STN 50-529,  
and STN 50-530

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**ADAMS Accession No. ML112430084**

**\*via email**

OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	NRR/LPL4/BC	NRR/LPL4/PM
NAME	LKGibson	JBurkhardt (ABaxter for)*	MMarkley	LKGibson
DATE	8/31/11	08/31/11	8/31/11	8/31/11

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