



A subsidiary of Pinnacle West Capital Corporation

10 CFR 50.54(f)

Palo Verde Nuclear
Generating Station

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102-06529-DCM/MAM/TLC
June 8, 2012

U.S. Nuclear Regulatory Commission
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- References:
1. NRC Letter, *"Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident,"* dated March 12, 2012
 2. APS Letter No. 102-06523 to NRC, dated May 11, 2012, "60-Day Response to NRC Letter, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident,* dated March 12, 2012"

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528, 50-529, and 50-530
90-Day Response to Emergency Preparedness Information
Requested by NRC Letter, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident***

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff issued a 10 CFR 50.54(f) letter to Arizona Public Service Company (APS) (Reference 1). Enclosure 5 of the letter contains specific Requested Actions and Requested Information associated with Recommendation 9.3 for Emergency Preparedness (EP) programs. In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (f), addressees were requested to submit a written response to the information requests. The letter also provided requested due dates for written responses.

A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance

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90 Day Response to 10 CFR 50.54(f) Letter Regarding Recommendation 9.3
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In accordance with Reference 1, on May 11, 2012, APS submitted an alternative course of action for providing the requested information (Reference 2). The alternative course of action included revised information due dates and the basis for those dates. As described in our alternative course of action, this letter transmits to you the responses for Communication Request 2 and Staffing Requests 3, 4, and 5.

Regulatory commitments made in this submittal are listed in Enclosure 2.

Should you have any questions concerning the content of this letter, please contact Mark McGhee, Operations Support Manager, Regulatory Affairs, at (623) 393-4972.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 6/8/12
(Date)

Sincerely,

W. C. Munn

DCM/MAM/TLC/hsc

Enclosure 1 – APS 90 Day Response to 10 CFR 50.54(f) Information Request for Recommendation 9.3, EP Communication and Staffing

Enclosure 2 - List of Regulatory Commitments

cc:	E. J. Leeds,	NRC Director, Office of Nuclear Reactor Regulation
	E. E. Collins Jr.	NRC Region IV Regional Administrator
	B. K. Singal	NRC NRR Project Manager for PVNGS
	L. K. Gibson	NRC NRR Project Manager
	J. R. Hall	NRC NRR Senior Project Manager
	M. A. Brown	NRC Senior Resident Inspector for PVNGS

Enclosure 1

APS 90 Day Response to 10 CFR 50.54(f) Information Request for Recommendation 9.3, EP Communication and Staffing

Communication Information Request #2:

Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.

Actions Taken or Planned:

Action	Estimated Completion Date
ACTIONS PLANNED: Obtain one portable diesel generator to provide backup power for the plant south private branch exchange (PBX) telephone system and public address (PA) system. The generator has been ordered (Ref PR 1031607) and is expected to arrive no later than December 31, 2012. (This action is being tracked under RCTSAI 4180972.)	12/31/2012
ACTIONS TAKEN: Purchased and distributed 20 handheld satellite telephones to provide communications capability in the event of unavailability of cellular and land-line telephones to enhance on-site communication with emergency response personnel and to enable a communication link with offsite agencies.	Complete

Enclosure 1

**APS 90 Day Response to 10 CFR 50.54(f) Information Request
for Recommendation 9.3, EP Communication and Staffing**

Staffing Information Request #3:

Identify how the augmented staff would be notified given degraded communications capabilities.

Methods for Notification Under Degraded Capabilities:

Assumptions (NEI 12-01, Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities):

1. On-site communications infrastructure remains available provided that the credited components are reasonably protected from seismic, wind, and flooding events; are maintained through programmatic controls; have a power source consistent with the other assumptions in this section; and are employed in accordance with implementing actions specified in existing procedures or guidelines.
2. Offsite infrastructure supporting communications systems is inoperable in the area surrounding the site (e.g., cellular telephone or microwave towers, telephone central office buildings, telephone lines, etc.). Apply a default distance value, in all directions, of approximately 25 miles from the plant site.
3. Communications infrastructure in locations beyond the area defined above is not significantly impacted by the event.
4. Communications equipment located at an offsite response facility, and supplied from a backup power source, is assumed to be functional. The availability of this equipment must be determined in conjunction with Assumption #2, above. For example, a diesel generator-powered satellite telephone system at an Emergency Operations Center (EOC) located 4 miles from the plant would be available since the system does not rely upon ground-based communications infrastructure within the affected area. A land-line telephone in the same EOC would not be available due to local infrastructure impacts consistent with Assumption #1.

Method	Description
Emergency Response Organization (ERO) Self-Activation	<p>A description of ERO self-activation has been included in the revised Emergency Preparedness Policy Guide 1503-01, which is used by ERO personnel. When the ERO becomes aware (e.g. direct observation, media posts, word-of-mouth) of an area-wide disaster (e.g. loss-of grid, natural or man-made disaster, etc.) that may impact the safe operation of Palo Verde and ERO pagers, cellular telephones, and home telephones are being challenged or are not working, the ERO is expected to report to their respective Emergency Response Facility.</p> <p>If the site is inaccessible due to the event (e.g. bridges damaged, roads blocked with debris, etc.) the ERO will report to the Emergency Operations Facility (EOF) as the alternative facility, staged for rapid response when access to the site is available.</p> <p>ERO self-activation expectations have been communicated to ERO staff and will be included in the 2012 ERO annual requalification training given to all ERO personnel.</p>

APS 90 Day Response to 10 CFR 50.54(f) Information Request
for Recommendation 9.3, EP Communication and Staffing

Staffing Information Request #4:

Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.

Methods for Site Access Following Large Scale Natural Event:

Method	Description
Roadway	<p>Major area access routes include the following:</p> <ul style="list-style-type: none"> • Interstate 10 (Eastbound): From California and the northwest • Interstate 17: From California and New Mexico via Interstate 40 • Interstate 10 (Westbound): From Tucson, New Mexico and Texas <p>Local access includes the following:</p> <ul style="list-style-type: none"> • Interstate 10 from the West or the East and then south on Wintersburg Rd. • State Route 85 and then west on Old U.S. 80 then west on Salome Highway to the north plant alternate access road. • Additionally, Palo Verde operates ~170 pool vans for ground transportation. These vans have pre-established protocols for pick-up or assembly locations. The use of personal vehicles is also anticipated. Palo Verde is located on a large site (~4,350 acres) and there are several access points from which to reach the Owner Controlled Area.
Air	<p>Access to Palo Verde could be provided from initial pre-identified staging areas.</p> <p>Pre-identified air staging areas include:</p> <ul style="list-style-type: none"> • Luke Air Force Base • Phoenix-Mesa Gateway Airport • Phoenix-Goodyear Municipal Airport • Falcon Field Airport (Mesa) • Stellar Airpark – Chandler • Pinal Airpark Airport / Evergreen • Buckeye Municipal Airport (State of Arizona and Palo Verde have a field office at this location) • Silverbell Army Heliport, Western Army National Guard Aviation Training Site (WAATS) <p>Available aircraft include active-duty and reserve National Guard resources which include medium duty (Blackhawk rotary-wing for personnel transport and medi-vac) and heavy-lift operations (i.e. locate large vehicles to the site via air).</p> <p>Air ambulance is available via Air-Evac and Native American Air via Letters of Agreement.</p>
Sea	Not Applicable

**APS 90 Day Response to 10 CFR 50.54(f) Information Request
for Recommendation 9.3, EP Communication and Staffing**

Staffing Information Request #5:

Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.

Interim Actions Taken or Planned:

Action	Completion Date
No interim actions have been taken and none are planned.	

Enclosure 2

List of Regulatory Commitments

The following table identifies the regulatory commitment in this document. Any other statements in this submittal represent intended or planned actions. They are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	COMMITMENT TRACKING NUMBER	SCHEDULED COMPLETION DATE
1. Emergency Response Organization (ERO) self-activation expectations will be included in the 2012 ERO annual requalification training given to all ERO personnel.	4182496	12/31/2012