



102-06670-DCM/MAM
February 28, 2013

DWIGHT C. MIMS
Senior Vice President, Nuclear
Regulatory & Oversight

Palo Verde
Nuclear Generating Station
P.O. Box 52034
Phoenix, AZ 85072
Mail Station 7605
Tel 623 393 5403

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

- References:
1. NRC Order Number EA-12-049, *Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, dated March 12, 2012
 2. NRC Interim Staff Guidance JLD-ISG-2012-01, *Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, Revision 0, dated August 29, 2012
 3. NEI 12-06, *Diverse and Flexible Coping Strategies (FLEX) Implementation Guide*, Revision 0, dated August 21, 2012
 4. APS Letter 102-06614, *Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)*, dated October 29, 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
APS Overall Integrated Plan in Response to March 12, 2012
Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to Arizona Public Service Company (APS). Reference 1 was immediately effective and directs APS to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an overall integrated plan by February 28, 2013. The NRC Interim Staff Guidance (ISG) (Reference 2) was issued August 29, 2012 which endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 3 provides direction regarding the content of this overall integrated plan.

AS1
NR

On October 29, 2012, APS provided the initial status report for PVNGS regarding mitigation strategies (Reference 4), as required by Reference 1.

The purpose of this letter is to provide an overall integrated plan pursuant to Section IV, Condition C.1, of Reference 1. This letter confirms APS has received Reference 2 and has an overall integrated plan developed in accordance with the guidance for defining and deploying strategies that will enhance the ability to cope with conditions resulting from beyond-design-basis external events.

The information in the enclosure provides the PVNGS Overall Integrated Plan for mitigation strategies that incorporates the guidance from Reference 3. The enclosed overall integrated plan is based on conceptual design information. Final design details and associated procedure guidance, as well as any revisions to the information contained in the Enclosure, will be provided in the 6-month updates required by Reference 1.

No commitments are being made to the NRC by this letter.

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 2/28/13
(Date)

Sincerely,

A.C. Merino

Enclosure - APS Overall Integrated Plan in Response to March 12, 2012 Commission Order
Modifying Licenses with Regard to Requirements for Mitigation Strategies for
Beyond-Design-Basis External Events

DCM/MAM/DKE/hsc

cc:	E. J. Leeds,	NRC Director, Office of Nuclear Reactor Regulation
	E. E. Collins Jr.	NRC Region IV Regional Administrator
	J. K. Rankin	NRC NRR Project Manager
	M. A. Brown	NRC Senior Resident Inspector for PVNGS
	J. A. Kratchman	NRR/JLD/PMB, NRC
	E. E. Bowman	NRR/DPR/PGCB, NRC