



10 CFR 50.90

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U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Reference: *Arizona Public Service (APS) Letter 102-06205, Responses to Follow-up Requests for Additional Information Regarding Buried Piping, Elastomers, Compressed Air, Containment Liner, Spray Ponds, and Supports, for the Review of the PVNGS License Renewal Application, and License Renewal Application Amendment No. 17, dated June 21, 2010*

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. STN 50-528, 50-529, and 50-530  
License Renewal Commitment Schedule Change Related to  
Spray Pond Wall Rework/Repair**

The purpose of this letter is to inform the NRC that Arizona Public Service Company (APS) has revised the scheduled completion date for rework/repair of spray pond walls related to the corresponding license renewal regulatory commitment documented in the referenced letter.

Enclosure 2 of the referenced letter provided the following commitment as a follow-up response to request for additional information (RAI) B2.1.33-2 under Updated Final Safety Analysis Report (UFSAR) Table A4-1, *License Renewal Commitments*, item number 56:

"The spray pond wall rework/repair methods are currently being determined, and the rework/repair is planned to begin in 2011. As Unit 1 spray ponds have the most degradation, work is planned to start there followed by Units 2 and 3. It is expected that the work will be completed in all three units in 2015."

The commitment was revised as follows:

"The rework/repair of the spray pond walls above the waterline will be completed by December 31, 2022."

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The original commitment was made to address the observed non-structural degradation of the spray pond concrete walls in the top regions of the walls above the waterline. Since the commitment was made, forensic testing and evaluation of the degradation conservatively concluded the structural integrity of the spray pond walls will remain unaffected through February 2024.

The structural evaluation concluded the spray pond walls would have sufficient capacity to withstand required design-load combinations, including tornado borne missile impact. This conclusion is applicable to the current conditions as well as the expected conditions through the revised schedule date.

The remediation requires more time to complete than originally planned. The remediation requires removal of the existing rebar in the top 3.25 inches of wall, replacement of the delaminated concrete over the rebar, and installation of cathodic protection on the entire wall.

The revised completion date ensures spray pond wall rework/repair will be completed while the structural integrity of the spray pond walls remains unaffected and prior to entry into the period of extended plant operation for each of the units. The period of extended operation begins as follows:

- June 1, 2025, for Unit 1
- April 24, 2026, for Unit 2
- November 25, 2027, for Unit 3

The extension of the scheduled commitment completion date was needed to permit completion of other station priorities, such as implementation of obligations to NRC requirements, including NRC orders EA-12-049, *Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, and EA-12-051, *Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation*. In addition, two higher priority license amendment requests (LARs) are currently being planned. These additional LARs address the following:

- Resolution of the non-conservative Technical Specification for spent fuel pool criticality analyses
- Implementation of risk-informed completion times per Technical Specification Task Force traveler TSTF-505, *Provide Risk-Informed Extended Completion Times – RITSTF 4b*

Completion of the modifications associated with the aforementioned NRC obligations and implementation of the LARs, including fire protection modifications to address multiple fire-induced faults, will improve the conservatism in plant design and enable the station to manage risk more effectively. They yield sustainable, long-term safety benefits that are achievable in the short term. In contrast, the spray pond wall

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rework/repair project resolves a non-structural degradation that has been evaluated and determined to not affect structural integrity beyond the revised scheduled completion date.

Application of station resources toward implementation of the current obligations and priorities coupled with the revised commitment date provides a cumulatively greater safety benefit. Therefore, the revised commitment date is necessary and warranted.

APS will update the PVNGS UFSAR discussion of this license renewal commitment in accordance with the requirements of 10 CFR 50.71(e).

Should you need further information regarding this submittal, please contact Thomas N. Weber, Nuclear Regulatory Affairs Department Leader, at (623) 393-5764.

Sincerely,

A handwritten signature in dark ink, appearing to read "Maria L. Dapas", followed by a horizontal line.

MLL/DCE/akf

cc:	M. L. Dapas	NRC Region IV Regional Administrator
	M. M. Watford	NRC NRR Project Manager for PVNGS
	C. A. Peabody	NRC Senior Resident Inspector for PVNGS
	L. J. Klos	NRC NRR Project Manager