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SUBJECT: Provides 120 day response to GL 97-01, "Degradation of Control Rod Drive Mechanism Nozzle & Other Vessel Closure Head Penetrations."

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102-03981 - JML/AKK/JRP  
July 30 1997

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Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. STN 50-528/529/530  
Response to NRC Generic Letter 97-01**

This letter provides Arizona Public Service Company's (APS) 120 day response to NRC Generic Letter 97-01, "Degradation of Control Rod Drive Mechanism Nozzle and Other Vessel Closure Head Penetrations". APS, in association with industry groups and the Combustion Engineering Owners Group (CEOG), has reviewed the information presented in the Generic Letter. The CEOG has prepared report CE NPSD - 1085 on behalf of it's members providing a complete and detailed response to the information requested by the Generic Letter. The CEOG report was submitted to the NRC by letter CEOG-97-244 dated July 25, 1997.

APS endorses CE NPSD- 1085, Rev.0 dated July 1997, which contains the information requested by the Generic Letter as it pertains to PVNGS. APS supports the CEOG integrated inspection program as described in the report and expects inspection data from this program to confirm that primary water stress corrosion cracking (PWSCC) of Alloy 600 reactor vessel head (RVH) nozzles does not represent a nuclear plant safety issue. APS also supports the NEI sponsored industry action to further develop a U.S. PWR integrated inspection program to address RVH penetration PWSCC concerns and develop appropriate analyses to support a sample inspection plan.

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In addition to limited CEOG plant inspections already performed, two additional CEOG plants with RVH Alloy 600 nozzles considered to have high susceptibility to PWSCC have made plans to inspect penetrations in Summer, 1997 and Spring, 1999. It is expected that these plant inspection data will further confirm the CEOG's RVH penetration cracking susceptibility modeling and support future inspection planning.

Should you have any questions, please call Scott A. Bauer at (602) 393-5978.

Sincerely,



JML/AKK/JRP/mah

cc: E. W. Merschoff  
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K. E. Perkins  
F. L. Brush  
D. F. Pilmer (CEOG)

STATE OF ARIZONA       )  
                                  ) ss.  
COUNTY OF MARICOPA   )

I, W. E. Ide, represent that I am Vice President Nuclear Engineering, Arizona Public Service Company (APS), that the foregoing document has been signed by me on behalf of APS with full authority to do so, and that to the best of my knowledge and belief, the statements made therein are true and correct.

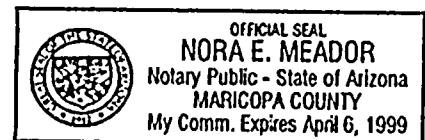
W. E. Ide  
W. E. Ide

Sworn To Before Me This 30 Day Of July, 1997.

Nora E. Meador  
Notary Public

My Commission Expires

April 6, 1999



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