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 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Public 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Public 05000530

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SUBJECT: Forwards studies in partial response to NRC first & second
 RAIs re risk-informed IST pilot program.

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102-03986 - WEI/AKK/RKB
July 31, 1997

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- References:
1. Letter No. 102-03554, dated November 27, 1995, from W. L. Stewart, APS to USNRC.
 2. Letter No. 102-03573, dated December 20, 1995, from W. L. Stewart, APS to USNRC.
 3. Letter dated March 15, 1996, from C. R. Thomas, USNRC to W. L. Stewart, APS.
 4. Letter No. 102-03714, dated June 7, 1996, from J. A. Bailey, APS to USNRC.
 5. Letter No. 102-03752, dated August 7, 1996, from W. L. Stewart, APS to USNRC.
 6. Letter No. 102-03763, dated August 23, 1996, from A. K. Krainik, APS to USNRC.
 7. Letter dated March 21, 1997, from J. W. Clifford, USNRC, to W. L. Stewart, APS.
 8. Letter dated June 9, 1997, from J. W. Clifford, USNRC, to J. M. Levine, APS.
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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
Engineering Studies Related to the Risk-Informed Inservice
Testing Pilot Program.**

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Arizona Public Service Company (APS) submitted a request (references 1 and 2) to the United States Nuclear Regulatory Commission (NRC) as part of a pilot plant effort related to risk-informed inservice testing (RI-IST). In reference 3, the NRC staff provided an initial request for additional information (RAI) to APS related to the RI-IST pilot program. A partial response to the initial RAI was provided by APS to the NRC staff via reference 4. In reference 5, APS committed to provide the NRC staff with a revised schedule for fully responding to the initial RAI by September 15, 1996. APS submitted additional information to the NRC staff related to the initial RAI in reference 6. A second RAI was provided to APS by the NRC staff via reference 7. In reference 8, the NRC staff provided APS with a third RAI related to draft regulatory guides and standard review plan sections released for public comment in support of risk-informed regulation and RI-IST.

In a continuing effort to support the RI-IST pilot program, APS recently completed several engineering studies. The enclosed documents have been developed to provide repeatable, scrutable, and documentable input to the integrated decision making process where quantitative risk information is not available. APS has not yet completed the establishment of the integrated risk-informed process itself, and the enclosed studies may be revised prior to use in that process. However, the studies are representative of the approach APS would use in providing information to be evaluated by the expert panel.

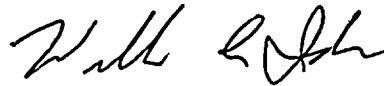
The enclosed studies are being provided to the NRC staff in partial response to the first and second RAI's (references 3 and 7). Enclosure 1 is an engineering study (13-NS-C17) entitled "*Analysis of Risk Based IST - Shutdown Modes.*" Enclosure 2 is a study entitled "*Valve Importance Sensitivity for External Events (Fire) for Risk-Based Inservice Testing,*" (13-NS-C27). Enclosure 3 (13-NS-C28) is a study entitled "*Seismic Risk Ranking to Support IST Risk Ranking Process.*"

APS requests that NRC fees not be assessed for this and other requests/reports associated with the RI-IST pilot program, based on the provisions of 10 CFR 171.21, footnote 4, item 3. This footnote to the Schedule of Facility Fees states that "Fees will not be assessed for requests/reports submitted to the NRC as a means of exchanging information between organizations and the NRC for the purpose of supporting generic regulatory improvements or efforts." The RI-IST pilot program is an industry initiative (with PVNGS and Commanche Peak as lead pilot plants) with the purpose of supporting generic regulatory improvements in Inservice Testing requirements.

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

Sincerely,



WEI/AKK/RKB/mah

Enclosure(s)

cc: E. W. Merschoff
K. E. Perkins
K. M. Thomas
F. L. Brush
D. C. Fischer

