

NRR-DMPSPeM Resource

From: Lingam, Siva
Sent: Friday, January 25, 2019 9:05 AM
To: Matthew.Cox@aps.com
Cc: Pascarelli, Robert; Alley, David; Ruffin, Steve; Tsao, John; Hovanec, Christopher; Young, Austin; Thomas.N.Weber@aps.com; Michael.Dilorenzo@aps.com
Subject: Palo Verde Nuclear Generating Station, Unit 3 - Acceptance of Relief Request 63, Impractical Examinations for the Third 10-Year ISI Interval (EPID L-2019-LLR-0002)

By letter dated January 10, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19010A307), Arizona Public Service Company (APS, the licensee) submitted relief request (RR)-63, seeking relief from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, 2001 Edition through the 2003 Addenda for the third 10-year interval for the In-Service Inspection (ISI) Program for Palo Verde Nuclear Generating Station (PVNGS), Unit 3. APS has determined that compliance with the Code requirements of achieving essentially 100 percent coverage of the welds listed in Table 1 of this RR is impractical for PVNGS, Unit 3. In accordance with Title 10 of the *Code of Federal Regulations*, Part 50 (10 CFR 50), Section 50.55a(g)(5)(iii), "ISI Program Update: Notification of Impractical ISI Code Requirements," this RR is based on actual demonstrated limitations when attempting to comply with the Code requirements in the performance of the examinations listed in Tables 1, 2 and 3 of this RR.

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review for RR 63. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed RR-63 in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 220 hours to complete. The NRC staff expects to complete this review approximately by January 31, 2020, or earlier. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager. These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, or unanticipated addition of scope to the review.

If you have any questions, please contact me at (301) 415-1564.

Siva P. Lingam
U.S. Nuclear Regulatory Commission
Project Manager
Palo Verde Nuclear Generating Station, Units 1, 2, and 3

Grand Gulf Nuclear Station

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Hearing Identifier: NRR_DMPS
Email Number: 776

Mail Envelope Properties (Siva.Lingam@nrc.gov20190125090500)

Subject: Palo Verde Nuclear Generating Station, Unit 3 - Acceptance of Relief Request
63, Impractical Examinations for the Third 10-Year ISI Interval (EPID L-2019-LLR-0002)
Sent Date: 1/25/2019 9:05:29 AM
Received Date: 1/25/2019 9:05:00 AM
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MESSAGE	3611	1/25/2019 9:05:00 AM

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