

NRR-DRMAPEm Resource

From: Lingam, Siva
Sent: Thursday, September 26, 2019 2:29 PM
To: Michael.Dilorenzo@aps.com
Cc: Pascarelli, Robert; Bailey, Stewart; Farnan, Michael; Thomas.N.Weber@aps.com; Carl.Stephenson@aps.com
Subject: Palo Verde 1, 2, and 3 - Acceptance Review for Relief Request VRR-01, Alternative Frequency to Perform Supplemental Indication Closure Testing of Pneumatic and Motor-Operated Valves per 10 CFR 50.55a(b)(3)(xi) (EPID L-2019-LLR-0093)

By letter dated September 20, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19263F875), Arizona Public Service Company (APS, the licensee) submitted relief request (RR) VRR-01, requesting an alternative per Title 10 of the *Code of Federal Regulations*, Part 50 (10 CFR 50), Paragraph 50.55a(z)(1), "Acceptable level of quality and safety," to perform supplemental indication closure testing that satisfies 10 CFR 50.55a(b)(3)(xi), "OM [Operation and Maintenance] condition: Valve Position Indication," at test frequencies required by 10 CFR 50 Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," for the valves listed in Table 1 of this RR for Palo Verde Nuclear Generating Station, Units 1, 2, and 3. The applicable Code is American Society of Mechanical Engineers (ASME) Operation and Maintenance of Nuclear Power Plants (OM Code), 2012 Edition. Currently, APS utilizes procedures developed for containment local leak rate (LLRT) program testing per 10 CFR 50, Appendix J, to satisfy the supplemental indication of valve closure. The licensee is performing these activities to meet the Subsection ISTC-3700, "Position Verification Testing," of ASME OM Code test frequency requirement. Subsection ISTC-3700 of the ASME OM Code requires obturator testing more frequent than the individual LLRT tests required by 10 CFR 50, Appendix j. The licensee desires to have the LLRT test frequency requirement satisfy both the obturator testing and LLRT individual valve testing.

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 VRR-01. 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 VRR-01 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 100 hours to complete. The NRC staff expects to complete this review approximately by March 1, 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
Location: O-9E22; Mail Stop: O-9E03
Telephone: 301-415-1564
E-mail address: Siva.Lingam@nrc.gov

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From: Lingam, Siva

Created By: Siva.Lingam@nrc.gov

Recipients:

"Pascarelli, Robert" <Robert.Pascarelli@nrc.gov>

Tracking Status: None

"Bailey, Stewart" <Stewart.Bailey@nrc.gov>

Tracking Status: None

"Farnan, Michael" <Michael.Farnan@nrc.gov>

Tracking Status: None

"Thomas.N.Weber@aps.com" <Thomas.N.Weber@aps.com>

Tracking Status: None

"Carl.Stephenson@aps.com" <Carl.Stephenson@aps.com>

Tracking Status: None

"Michael.Dilorenzo@aps.com" <Michael.Dilorenzo@aps.com>

Tracking Status: None

Post Office: CY4PR09MB1239.namprd09.prod.outlook.com

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