



102-08030-MLL/MDD
December 19, 2019

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- References:
1. Arizona Public Service Company (APS) letter number 102-07727, *License Amendment Request (LAR) and Exemption Request to Support the Implementation of Framatome High Thermal Performance Fuel*, dated July 6, 2018, Agencywide Documents Access and Management System (ADAMS) Accession Numbers ML18187A417 (non-proprietary) and ML18187A418 (proprietary)
 2. APS letter number 102-008012, *Response to NRC Request for Additional Information Regarding License Amendment and Exemption Requests Related to the Implementation of Framatome CE16HTP Fuel*, dated October 4, 2019, ADAMS Accession Numbers ML19277J457 (non-proprietary) and ML19277J458 (proprietary)

Dear Sir:

Subject: **Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2, and 3**
Docket Nos. STN 50-528, 50-529, and 50-530
Renewed Operating License Nos. NPF-41, NPF-51, and NPF-74
Supplemental Information Related to Framatome CE16HTP Fuel LAR
Requests for Additional Information BHTP RAI-05 and BHTP RAI-06

By letter dated July 6, 2018 (Reference 1), Arizona Public Service Company (APS) submitted a license amendment request (LAR) pursuant to the provisions of Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR) and an exemption request pursuant to the provisions of 10 CFR 50.12, to request approval of proposed changes to the PVNGS Technical Specifications (TS) to support the implementation of Framatome CE16HTP fuel with M5® cladding and gadolinia as a burnable absorber. By letter dated October 4, 2019 (Reference 2), APS provided additional information in response to an NRC staff request for additional information (RAI), which included responses to specific NRC staff RAIs BHTP RAI-05 and BHTP RAI-06.

Subsequent to the submittal of Reference 2, APS was informed by Framatome of an issue regarding the Test 51 results and design limit value reported in the NRC approved Topical Report BAW-10241(P)(A), Revision 0, *BHTP Correlation Applied in LYNXT* (ADAMS Accession Number ML043650303). Data from this topical report was used in the VIPRE to LYNXT

comparisons provided in the BHTP RAI-05 and BHTP RAI-06 responses in Reference 2. The issue impacts the Test 51 VIPRE to LYNXT comparisons. The APS VIPRE analyses which are the basis for the proposed PVNGS departure from nucleate boiling ratio limit and associated statistical data are not affected by this issue. This issue was entered into both the PVNGS and Framatome corrective action programs.

Framatome performed an evaluation of the Test 51 error in accordance with their corrective action program. Framatome's review concluded that the impact on the reported information is minor and that correcting the issue will slightly improve the agreement between the VIPRE and LYNXT results for Test 51. Therefore, APS and Framatome agree that the conclusions in the RAI responses remain valid.

As a part of the PVNGS corrective action program, the correction to Framatome Topical Report BAW-10241(P)(A) will be incorporated into the PVNGS Core Operating Limits Report as required by Technical Specification 5.6.5. As required by the PVNGS corrective action program, any impacted analyses will be updated as required to account for the correction to BAW-10241(P)(A).

No commitments are being made to the NRC by this letter. If you have any questions about this request, please contact Michael D. DiLorenzo, Licensing Department Leader, at (623) 393-3495.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: December 19, 2019

Sincerely,



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cc:	S. A. Morris	NRC Region IV Regional Administrator
	S. P. Lingam	NRC NRR Project Manager for PVNGS
	C. A. Peabody	NRC Senior Resident Inspector for PVNGS