

**From:** Lingam, Siva  
**Sent:** Wednesday, May 26, 2021 1:32 PM  
**To:** Matthew.Cox@aps.com  
**Cc:** Dixon-Herrity, Jennifer; Wengert, Thomas; Buford, Angie; Scarbrough, Thomas; Michael.Dilorenzo@aps.com; Ashley, Clinton; Villarreal, Tristan  
**Subject:** Palo Verde 1, 2 and 3 - Official RAIs for LAR Associated with Permanent Extension of Containment ILRT Frequency to 15 Years (Type A) and CIV Leak Rate Test Frequency to 75 Months (Type C) (EPID L-2021-LLA-0006)

By letter dated January 22, 2021 (Agencywide Documents Access and Management System Accession No. ML21022A408), Arizona Public Service Company (APS) submitted a license amendment request (LAR) to revise the Technical Specifications (TSs) for Palo Verde Nuclear Generating Station, Units 1, 2, and 3 (Palo Verde). Specifically, the proposed change is a request to revise TS 5.5.16, *Containment Leakage Rate Testing Program*, to allow the following:

- Change the existing Type A integrated leakage rate test (ILRT) program test interval to 15 years in accordance with Nuclear Energy Institute (NEI) Topical Report NEI 94-01, *Industry Guideline for Implementing Performance-Based Option of [Title 10 of the Code of Federal Regulations (10 CFR)] 10 CFR 50, Appendix J, [Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors]*, Revision 3-A, and the limitations and conditions specified in NEI 94-01, Revision 2-A.
- Adopt an extension of the containment isolation valve (CIV) leakage rate testing (Type C) frequency from the 60 months currently permitted by 10 CFR 50, Appendix J, Option B, to 75 months for Type C leakage rate testing of selected components, in accordance with NEI 94-01, Revision 3-A.
- Adopt the use of American National Standards Institute/American Nuclear Society (ANSI/ANS) 56.8-2002, *Containment System Leakage Testing Requirements*.
- Adopt a more conservative allowable test interval extension of nine months, for Type A, Type B and Type C leakage rate tests in accordance with NEI 94-01, Revision 3-A.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed your application for the subject LAR and concluded that additional information is required for complete evaluation. We transmitted the draft requests for additional information (RAIs) for the subject license amendment on May 14, 2021, and at your request, held a clarification call on May 26, 2021. Please note the following **official** RAIs from the NRC staff for the subject license amendment, and provide your responses by June 25, 2021, as mutually agreed during the clarification call. Your timely responses will allow the NRC staff to complete its review on schedule.

#### EMIB-RAI-1

According to current NRC information, the 2012 Edition of the ASME *Operation and Maintenance of Nuclear Power Plants*, Division 1, OM Code: Section IST (OM Code), as incorporated by reference in 10 CFR 50.55a, "Codes and standards," is the current OM Code of record for the Inservice Testing (IST) Program at Palo Verde Units 1, 2, 3. ASME OM Code (2012 Edition), Subsection ISTC, "Inservice Testing of Valves in Light-Water Reactor Nuclear Power Plants," Paragraph ISTC-3620, "Containment Isolation Valves," specifies that CIVs with a leakage rate requirement based on 10 CFR Part 50, Appendix J, shall be tested in accordance

with the Owner's 10 CFR Part 50, Appendix J program. Please discuss the basis for not including an alternative request to the ASME OM Code requirements in accordance with 10 CFR 50.55a(z), "Alternatives to codes and standards requirements," as part of the LAR dated January 22, 2021, to extend the leakage rate test interval for the applicable CIVs at Palo Verde.

#### EMIB-RAI-2

The LAR, dated January 22, 2021, proposes an extension of the CIV leakage rate testing (Type C) interval from 60 months to 75 months for applicable CIVs at Palo Verde. Please provide a summary description of the performance of the applicable CIVs that supports the proposed extension of the CIV leakage rate testing (Type C) interval.

Siva P. Lingam  
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**Hearing Identifier:** NRR\_DRMA  
**Email Number:** 1207

**Mail Envelope Properties** (BLAPR09MB610096CD2574BC2BCF7FF3F1F6249)

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**Sent Date:** 5/26/2021 1:32:00 PM

**Received Date:** 5/26/2021 1:31:00 PM

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**Post Office:** BLAPR09MB6100.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	3873	5/26/2021 1:31:00 PM

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**Expiration Date:**