



Palo Verde Nuclear Generating Station Containment Post-Tensioning System Inspection Unit 2

Relief Request 69 Pre-Submittal Call with NRC
January 25, 2022

Agenda

- Introduction
- Code Required Tendon Surveillance
- Proposed Relief Request 69
- Relief Request Summary
- Schedule
- Questions/Comments



Code Required Tendon Surveillance

- ASME BPVC Section XI Subsection IWL-2420 requires containment post-tensioning systems to be examined visually every 5 years (10 years for physical exams)
- 35th surveillance year was February 2020
 - PVNGS deadline for inspection was 2/8/21
 - Extended to 2/8/22 by Relief Request (RR) 66
- The surveillance was previously performed in 2015 and 2011 (30th and 25th year surveillances)
 - Both surveillances concluded the post-tensioned tendons met the applicable Code requirements with no abnormal degradation of the post-tensioning system identified
- The 35th year surveillance is currently in progress
- The final test report will not be complete by 2/8/22



Proposed Relief Request 69

Purpose and Basis

- Requesting relief from the requirements of IWL-2420 regarding the interval between containment tendon inspections for Unit 2
- Pursuant to 10 CFR 50.55a(z)(2)
 - Representing a hardship or unusual difficulty without a compensating increase in the level of quality and safety
- Applies to ASME Code Class CC Concrete Component of Light-Water Cooled Plants - Containment Post-Tensioning System Inspections
- Requesting approximately 3-month extension of the current 12-month extension provided by RR 66 to permit time to finalize the inspection report and complete the surveillance



Proposed Relief Request 69

Purpose and Basis

- Good faith efforts made to complete by 2/8/22 date
 - Examinations originally scheduled to start in November 2021
 - Delays in vendor completion of work at other sites
 - Inspections initiated at PVNGS January 2022
 - Majority of inspection work complete by 2/8/22
 - Continuing to experience COVID-19 impacts
 - Final vendor report targeted for March 2022
 - Final APS acceptance targeted for April 2022
- Past Unit 2 examinations support technical adequacy of Unit 2 containment tendons as described in RR 66
- RR 67 provides a description of Units 1 and 3 similar design and basis for a further extension of certain examinations to 20-years (APS letter 102-08286 dated July 29, 2021, ML21210A300)
 - Data from these examinations will be used to form the basis for a similar Unit 2 RR at a later date



Relief Request Summary

- RR 66 was submitted as a hardship per 10 CFR 50.55a(z)(2) due to the COVID-19 pandemic
 - Provided a one-time extension of the 35th year inspections to 2/8/2022
 - Verbal approval received 11/19/2020 (ML20325A039)
 - Written approval received 4/2/21 (ML21089A010)
- Proposed RR 69 requests an approximately 3-month extension of current 12-month extension provided by RR 66 to permit completion of final test report and surveillance



Schedule

- Planning to submit January 28, 2022
- NRC approval requested by February 8, 2022





Questions/Comments