



Palo Verde Nuclear
Generating Station

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10CFR50.55a

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102-04395-CDM/SAB/RKB
January 12, 2000

U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Dear Sirs:

References:

1. APS Letter No. 102-04232-WEI/AKK/MLG, dated January 11, 1999, from W.E. Ide, APS, to NRC, "Unit 3 First Ten Year Inservice Inspection Program Revision."
2. APS Letter No. 102-04312-WEI/SAB/RKB, dated July 16, 1999, from W.E. Ide, APS, to NRC, "Unit 1 First 10-Year Interval Inservice Inspection (ISI) Program – Revision 2."

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 3
Docket No. STN 50-530
First 10-Year Interval Inservice Inspection Programs –
Revision 3**

In reference 1 above, pursuant to the requirements of 10 CFR 50.55a(g)(4) and 10 CFR 50.55a(g)(5)(i), Arizona Public Service Company (APS) submitted revision 2 to the PVNGS Unit 3 first 10-year interval Inservice Inspection (ISI) program. The revision documented the final status of the PVNGS Unit 3 first interval ISI program and was accompanied by several new or revised requests for relief.

In preparation of the final revision of the Unit 1 first 10-year ISI program, reference 2, APS identified minor changes to the Unit 3 first interval ISI program which were not included in the revision 2 submittal. Those changes are provided in enclosure 1.

In addition, APS identified the need for an additional request for relief that was not included in the original Unit 3, revision 2 submittal. Pursuant to the requirements of 10 CFR 50.55a(g)(5)(iv), APS hereby submits Relief Request No. 15 for the Unit 3 first interval ISI program. This relief request is identical to Relief Request No. 16 for the Unit 1 first interval ISI Program submitted in reference 2, above.

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Relief Request No. 15, provided in enclosure 2, requests relief from the IWB-5210 and Table IWB-2500-1 requirements to perform VT-2 examinations of the reactor vessel at no less than normal operating pressure. This examination is impractical due to extreme temperatures and high radiation fields in certain areas requiring personnel occupancy in order to complete the exam.

No commitments are being made to the NRC by this letter.

Should you have any questions, please contact Scott A. Bauer at (623) 393-5978.

Sincerely,

A handwritten signature in black ink that reads "David Mauldin". The signature is written in a cursive style with a large, stylized initial "D".

CDM/SAB/RKB/kg

Enclosures

cc: E. W. Merschoff [Region IV Administrator]
M. B. Fields [NRR Project Manager]
J. H. Moorman [Sr. Resident Inspector]