



A subsidiary of Pinnacle West Capital Corporation

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102-06454-DCM/RAS/CJS
December 29, 2011

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001


Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. 50-528, 50-529, and 50-530
Request for Approval to Use a Subsequent American Society of
Mechanical Engineers (ASME) Code Edition and Addenda for Examination
Categories B-L-1, B-M-1, and C-G in the Third ISI Interval**

Pursuant to 10 CFR 50.55a(g)(4)(iv), Arizona Public Service Company (APS) requests NRC approval to use a subsequent ASME Code Edition and Addenda for the ASME Section XI, Examination Categories B-L-1, B-M-1, and C-G, in the third Inservice Inspection (ISI) interval for PVNGS. This request is consistent with Regulatory Issue Summary (RIS) 2004-12, *NRC Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI*. No commitments are being made to the NRC by this letter.

Should you need further information regarding this request, please contact Russell A. Stroud, Licensing Section Leader, at (623) 393-5111.

Sincerely,


FOR D. C. MIMS

DCM/RAS/CJS/gat

Enclosure: Request for Approval to Use a Subsequent American Society of Mechanical Engineers (ASME) Code Edition and Addenda for Examination Categories B-L-1, B-M-1, and C-G, in the Third ISI Interval

cc: E. E. Collins Jr. NRC Region IV Regional Administrator
B. K. Singal NRC NRR Project Manager for PVNGS
J. R. Hall NRC NRR Senior Project Manager
L. K. Gibson NRC NRR Project Manager
M. A. Brown NRC Senior Resident Inspector for PVNGS

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ENCLOSURE

**Request for Approval to Use a Subsequent American Society of
Mechanical Engineers (ASME) Code Edition and Addenda for
Examination Categories B-L-1, B-M-1, and C-G, in the Third ISI
Interval**

Enclosure
Request for Approval to Use a Subsequent American Society of Mechanical Engineers (ASME) Code Edition and Addenda for Examination Categories B-L-1, B-M-1 and C-G, in the Third ISI Interval

Arizona Public Service Company (APS) requests approval to use a subsequent ASME Code Edition and Addenda for Examination Categories B-L-1, B-M-1, and C-G, in accordance with 10 CFR 50.55a(g)(4)(iv), for the third Inservice Inspection (ISI) interval. This request is consistent with Regulatory Issue Summary (RIS) 2004-12, *NRC Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI*. The third ISI interval for Units 1, 2, and 3 begin and end as follows:

Unit 1 – July 18, 2008 to July 17, 2018

Unit 2 – March 18, 2007 to March 17, 2017

Unit 3 – January 11, 2008 to January 10, 2018

1. ASME Code Component(s) Affected

The affected components are ASME Section XI, Examination Categories:

- B-L-1, Pressure Retaining Welds in Pump Casings
- B-M-1, Pressure Retaining Welds in Valve Bodies
- C-G, Pressure Retaining Welds in Pumps and Valves

2. Applicable Code Edition and Addenda

The Code of Record for the current ISI interval for Code Class 1, 2, and 3 components is the ASME Section XI, 2001 Edition, 2003 Addenda. This Code of Record is applicable to the ASME Category B-L-1, B-M-1, and C-G welds, for which the use of subsequent ASME Code Edition and Addenda is being requested. The current ISI Plans were provided to the NRC staff for each of the PVNGS Units by APS letter number 102-06420, dated October 4, 2011. The revised Plans reflect the use of the subsequent Code Edition and Addenda with regard to these examinations. The examinations would not be required to be performed under the Code of Record until the last period of the current inspection interval.

3. Proposed Subsequent Code Edition and Addenda (or Portion)

The subsequent code edition and addenda proposed for the third interval of the ISI Program, Examination Categories B-L-1, B-M-1, and C-G is ASME Section XI, 2007 Edition, 2008 Addenda. In the 2008 Addenda, Examination Categories B-L-1, B-M-1, and C-G were deleted from the Code.

In the 2001 Edition, 2003 Addenda of ASME Section XI:

- Category B-L-1 requires a visual examination (VT-1) of pump casing welds
- Category B-M-1 requires a surface examination of valve body welds for valves less than 4 inches NPS [nominal pipe size] and a volumetric examination for valves larger than 4 inches NPS

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- Category C-G requires a surface examination of pump and valve body welds in all components in each piping run examined under Category C-F

ASME Category B-L-1, B-M-1, and C-G welds were removed in the ASME Section XI, 2007 Edition, 2008 Addenda because experience has not identified any failures in pump casing or valve body welds. The requirement for performing these examinations results in unnecessary radiation exposure for non-destructive examination (NDE) personnel.

For Class 1 pressure retaining pump casing and valve body welds, any degradation of the pump or valve interior will be detected by the Category B-L-2 and B-M-2 VT-3 examinations or by the mechanic working on the component internals. Through wall leakage will be detected by the VT-2 examinations during system pressure tests.

For Class 2 welds in pumps and valves, any degradation of the pump or valve interior will be detected by the mechanic working on the component internals. Through wall leakage will be detected by the VT-2 examinations during system pressure tests.

The subsequent code edition and addenda proposed for the third interval of the ISI Program is ASME Section XI, 2007 Edition, 2008 Addenda, for Examination Categories B-L-1, B-M-1, and C-G. The 2008 Addenda of Section XI has been incorporated into the regulations by reference, as published in the Federal Register on July 21, 2011 (76 FR 36232), and became effective July 21, 2011.

4. Related Requirements

For the portion of the subsequent Code Edition and Addenda to be used, no related requirements would need to be implemented since the 2008 Addenda deletes Examination Categories B-L-1, B-M-1, and C-G from the Code.

5. Duration of Proposed Request

The duration of use of the proposed subsequent Code Edition and Addenda for PVNGS Units 1, 2, and 3 is the third ISI interval, which ends July 17, 2018, March 17, 2017, and January 10, 2018, respectively.