From: ^PNNL gc859-frn-comments
To: Wahlstrom, Hallie
Cc: Stefanovic, Peter; Buth, Donald J
Subject: RE: Palo Verde/APS Comments on OMB Control Number 1901-0287
Date: Tuesday, October 14, 2025 10:59:45 AM
Attachments: image001.png

Thank you for your comments and for bringing this to our attention.

In response to each of your comments, we have made the following changes:

1. Added the word "optional" to Section C.1 column 3 description after "assembly-average initial enrichment" on page 7.
2. Clarification sentences were added on page 18, “Report plutonium content for Mixed Oxide Fuel” and “Report plutonium enrichment for Mixed Oxide Fuel.”
3. Switched footnotes 3 and 4 with each other on page 39.
4. Changed "of" to "or" in the table header so it now reads as "RCRA Listed Hazardous Waste Constituents or Characteristics" on page 56.

Best regards,
GC-859 Survey Support Team
https://gc859.pnnl.gov

From: Wahlstrom, Hallie <Hallie.Wahlstrom@aps.com>
Sent: Friday, October 10, 2025 4:53 PM
To: ^PNNL gc859-frn-comments <gc859-frn-comments@pnnl.gov>
Cc: Stefanovic, Peter <peter.stefanovic@pnnl.gov>; Buth, Donald J <Don.Buth@aps.com>
Subject: Palo Verde/APS Comments on OMB Control Number 1901-0287

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Hello!

I have reviewed FRN 41996 and the new form GC859 and have provided my comments below:

- The difference between max planar-avg and assembly average enrichment is a difficult one for Palo Verde. We might have been reporting an incorrect number all these years as we do not receive planar enrichments from the vendor. Our 741s consist of pin enrichments (low, mid, high) and U weights, and it looks like we have reported the assembly average in the past. However, our fuel designs are likely much more simple than other plants and it would not differ much. My main comment is that the FR states that the assembly average enrichment is optional, but that is not noted anywhere in C.1 or C.1.1.
- On page 18, I wanted to make sure that the Pu wt% columns would be optional on table

C.2 as well? Given that not everyone has mixed oxide fuel.

- On page 39, I think that notes 3 and 4 are swapped. Note 3 should be about damaged fuel, and note 4 should be about total weight.
- Page 56, “constituents OR characteristics” was changed to “constituents OF characteristics” in the table, but not in note 4.

Let me know if you need any clarification,

PaloVerde™
GENERATING STATION

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