



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 9, 2014

Mr. Randall K. Edington  
Executive Vice President Nuclear/  
Chief Nuclear Officer  
Mail Station 7602  
Arizona Public Service Company  
P.O. Box 52034  
Phoenix, AZ 85072-2034

SUBJECT: PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3 -  
ISSUANCE OF AMENDMENTS RE: REQUEST TO AMEND TECHNICAL  
SPECIFICATIONS 3.3.3, "CONTROL ELEMENT ASSEMBLY CALCULATORS  
(CEACS)," AND 3.3.6, "ENGINEERED SAFETY FEATURES ACTUATION  
SYSTEM (ESFAS) LOGIC AND MANUAL TRIP" (TAC NOS. MF2879, MF2880,  
AND MF2881)

Dear Mr. Edington:

The Commission has issued the enclosed Amendment No. 194 to Renewed Facility Operating License No. NPF-41, Amendment No. 194 to Renewed Facility Operating License No. NPF-51, and Amendment No. 194 to Renewed Facility Operating License No. NPF-74 for the Palo Verde Nuclear Generating Station, Units 1, 2, and 3, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated September 27, 2013, as supplemented by letter dated December 12, 2013.

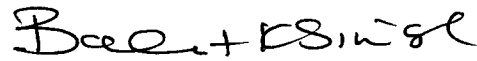
The amendments revise TS 3.3.3, "Control Element Assembly Calculators (CEACs)," to reinstate the 4-hour completion time in TS 3.3.3, Required Action B.2.2 that was inadvertently omitted in Amendment No. 152, dated March 23, 2004. Additionally, the amendments revise a test frequency note in Surveillance Requirement (SR) 3.3.6.2 under TS 3.3.6, "Engineered Safety Features Actuation System (ESFAS) Logic and Manual Trip," which should have been addressed in Amendment No. 188, dated December 15, 2011, that adopted Technical Specifications Task Force (TSTF) change traveler TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF [Risk-Informed TSTF] Initiative 5b".

R. Edington

- 2 -

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink, appearing to read "Balwant K. Singal". The signature is fluid and cursive, with the first name "Balwant" being more prominent.

Balwant K. Singal, Senior Project Manager  
Plant Licensing Branch IV-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-528, STN 50-529,  
and STN 50-530

Enclosures:

1. Amendment No. 194 to NPF-41
2. Amendment No. 194 to NPF-51
3. Amendment No. 194 to NPF-74
4. Safety Evaluation

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

ARIZONA PUBLIC SERVICE COMPANY, ET AL.

DOCKET NO. STN 50-528

PALO VERDE NUCLEAR GENERATING STATION, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 194  
License No. NPF-41

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Arizona Public Service Company (APS or the licensee) on behalf of itself and the Salt River Project Agricultural Improvement and Power District, El Paso Electric Company, Southern California Edison Company, Public Service Company of New Mexico, Los Angeles Department of Water and Power, and Southern California Public Power Authority dated September 27, 2013, as supplemented by letter dated December 12, 2013, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

Enclosure 1

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C(2) of Renewed Facility Operating License No. NPF-41 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 194, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this license. APS shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan, except where otherwise stated in specific license conditions.

3. This license amendment is effective as of the date of issuance and shall be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Eric R. Oesterle, Acting Chief  
Plant Licensing Branch IV-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Renewed Facility  
Operating License No. NPF-41  
and Technical Specifications

Date of Issuance: September 9, 2014



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

ARIZONA PUBLIC SERVICE COMPANY, ET AL.

DOCKET NO. STN 50-529

PALO VERDE NUCLEAR GENERATING STATION, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 194  
License No. NPF-51

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Arizona Public Service Company (APS or the licensee) on behalf of itself and the Salt River Project Agricultural Improvement and Power District, El Paso Electric Company, Southern California Edison Company, Public Service Company of New Mexico, Los Angeles Department of Water and Power, and Southern California Public Power Authority dated September 27, 2013, as supplemented by letter dated December 12, 2013, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

Enclosure 2

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C(2) of Renewed Facility Operating License No. NPF-51 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 194, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this license. APS shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan, except where otherwise stated in specific license conditions.

3. This license amendment is effective as of the date of issuance and shall be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Eric R. Oesterle, Acting Chief  
Plant Licensing Branch IV-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Renewed Facility  
Operating License No. NPF-51  
and Technical Specifications

Date of Issuance: September 9, 2014



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

ARIZONA PUBLIC SERVICE COMPANY, ET AL.

DOCKET NO. STN 50-530

PALO VERDE NUCLEAR GENERATING STATION, UNIT 3

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 194  
License No. NPF-74

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Arizona Public Service Company (APS or the licensee) on behalf of itself and the Salt River Project Agricultural Improvement and Power District, El Paso Electric Company, Southern California Edison Company, Public Service Company of New Mexico, Los Angeles Department of Water and Power, and Southern California Public Power Authority dated September 27, 2013, as supplemented by letter dated December 12, 2013, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C(2) of Renewed Facility Operating License No. NPF-74 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 194, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this license. APS shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan, except where otherwise stated in specific license conditions.

3. This license amendment is effective as of the date of issuance and shall be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Eric R. Oesterle, Acting Chief  
Plant Licensing Branch IV-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Renewed Facility  
Operating License No. NPF-74  
and Technical Specifications

Date of Issuance: September 9, 2014



ATTACHMENT TO LICENSE AMENDMENT NOS. 194, 194, AND 194

RENEWED FACILITY OPERATING LICENSE NOS. NPF-41, NPF-51, AND NPF-74

DOCKET NOS. STN 50-528, STN 50-529, AND STN 50-530

Replace the following pages of the Renewed Facility Operating Licenses Nos. NPF-41, NPF-51, and NPF-74, and Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Renewed Facility Operating License No. NPF-41

REMOVE

5

INSERT

5

Renewed Facility Operating License No. NPF-51

REMOVE

6

INSERT

6

Renewed Facility Operating License No. NPF-74

REMOVE

4

INSERT

4

Technical Specifications

REMOVE

3.3.3-2

3.3.6-3

INSERT

3.3.3-2

3.3.6-3

(1) Maximum Power Level

Arizona Public Service Company (APS) is authorized to operate the facility at reactor core power levels not in excess of 3990 megawatts thermal (100% power), in accordance with the conditions specified herein.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 194, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this renewed operating license. APS shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan, except where otherwise stated in specific license conditions.

(3) Antitrust Conditions

This renewed operating license is subject to the antitrust conditions delineated in Appendix C to this renewed license.

(4) Operating Staff Experience Requirements

Deleted

(5) Post-Fuel-Loading Initial Test Program (Section 14, SER and SSER 2)\*

Deleted

(6) Environmental Qualification

Deleted

(7) Fire Protection Program

APS shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility, as supplemented and amended, and as approved in the SER through Supplement 11, subject to the following provision:

APS may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

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\* The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

(1) Maximum Power Level

Arizona Public Service Company (APS) is authorized to operate the facility at reactor core power levels not in excess of 3990 megawatts thermal (100% power) in accordance with the conditions specified herein.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 194, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this renewed operating license. APS shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan, except where otherwise stated in specific license conditions.

(3) Antitrust Conditions

This renewed operating license is subject to the antitrust conditions delineated in Appendix C to this renewed operating license.

(4) Operating Staff Experience Requirements (Section 13.1.2, SSER 9)\*

Deleted

(5) Initial Test Program (Section 14, SER and SSER 2)

Deleted

(6) Fire Protection Program

APS shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility, as supplemented and amended, and as approved in the SER through Supplement 11, subject to the following provision:

APS may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

(7) Inservice Inspection Program (Sections 5.2.4 and 6.6, SER and SSER 9)

Deleted

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\* The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

- (4) Pursuant to the Act and 10 CFR Part 30, 40, and 70, APS to receive, possess, and use in amounts required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (5) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, APS to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

Arizona Public Service Company (APS) is authorized to operate the facility at reactor core power levels not in excess of 3990 megawatts thermal (100% power), in accordance with the conditions specified herein.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 194, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this renewed operating license. APS shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan, except where otherwise stated in specific license conditions.

(3) Antitrust Conditions

This renewed operating license is subject to the antitrust conditions delineated in Appendix C to this renewed operating license.

(4) Initial Test Program (Section 14, SER and SSER 2)

Deleted

(5) Additional Conditions

The Additional Conditions contained in Appendix D, as revised through Amendment No. 171, are hereby incorporated into this renewed operating license. The licensee shall operate the facility in accordance with the Additional Conditions.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.2.1 Verify the departure from nucleate boiling ratio requirement of LCO 3.2.4. "Departure from Nucleate Boiling Ratio (DNBR)." is met.	4 hours
	<u>AND</u>	
	B.2.2 Verify all full strength and part strength control element assembly (CEA) groups are fully withdrawn and maintained fully withdrawn, except during Surveillance testing pursuant to SR 3.1.5.3 or for control, when CEA group #5 may be inserted to a maximum of 127.5 inches withdrawn.	4 hours
	<u>AND</u>	
	B.2.3 Verify the "RSPT/CEAC Inoperable" addressable constant in each affected core protection calculator (CPC) is set to indicate that both CEACs are inoperable.	4 hours
	<u>AND</u>	
		(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Required Action and associated Completion Time of Conditions for Safety Injection Actuation Signal, Containment Isolation Actuation Signal, or Recirculation Actuation Signal not met.	F.1 Be in MODE 3.	6 hours
	<u>AND</u> F.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.3.6.1 -----NOTE----- Testing of Actuation Logic shall include the verification of the proper operation of each initiation relay. -----</p> <p>Perform a CHANNEL FUNCTIONAL TEST on each ESFAS logic channel and Manual Trip channel.</p>	In accordance with the Surveillance Frequency Control Program
<p>SR 3.3.6.2 -----NOTE----- Relays exempt from testing during operation shall be tested in accordance with the Surveillance Frequency Control Program. -----</p> <p>Perform a subgroup relay test of each Actuation Logic channel, which includes the de-energization of each subgroup relay and verification of the OPERABILITY of each subgroup relay.</p>	In accordance with the Surveillance Frequency Control Program



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NOS. 194, 194, AND 194 TO RENEWED FACILITY  
OPERATING LICENSE NOS. NPF-41, NPF-51, AND NPF-74  
ARIZONA PUBLIC SERVICE COMPANY, ET AL.  
PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3  
DOCKET NOS. STN 50-528, STN 50-529, AND STN 50-530

1.0 INTRODUCTION

By application dated September 27, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13280A264), as supplemented by letter dated December 12, 2013 (ADAMS Accession No. ML13352A007), Arizona Public Service Company (APS, the licensee) requested changes to the Technical Specifications (TSs) for Palo Verde Nuclear Generating Station (PVNGS), Units 1, 2, and 3, to reinstate an inadvertently omitted 4-hour completion time within TS 3.3.3, "Control Element Assembly Calculators (CEACs)," and to revise a test frequency note within a Surveillance Requirement (SR) under TS 3.3.6, "Engineered Safety Features Actuation System (ESFAS) Logic and Manual Trip." The supplemental letter dated December 12, 2013, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the U.S. Nuclear Regulatory Commission (NRC) staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on February 4, 2014 (79 FR 6640).

The licensee requested a TS change to reinstate the 4-hour completion time in TS 3.3.3, "Control Element Assembly Calculators (CEACs)," Required Action B.2.2 that was inadvertently omitted in the license amendment request (LAR) dated September 17, 2003 (ADAMS Accession No. ML032670629), for Amendment No. 152, dated March 23, 2004 (ADAMS Package Accession No. ML040860597). This change restores the 4-hour completion time for Required Action B.2.2 that existed prior to being inadvertently omitted.

The licensee also requested to modify the Note within SR 3.3.6.2 under TS 3.3.6, "Engineered Safety Features Actuation System (ESFAS) Logic and Manual Trip," which states "Relays exempt from testing during operation shall be tested each 18 months." The licensee proposes to replace "18 months" with "in accordance with the Surveillance Frequency Control Program" in the Note. The change would make the Note consistent with the Frequency of SR 3.3.6.2, which states, "In accordance with the Surveillance Frequency Control Program," and was last revised

when Amendment No. 188 was issued to reflect the adoption of Technical Specifications Task Force (TSTF) change travel TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF [Risk-Informed TSTF] Initiative 5b," dated December 15, 2011 (ADAMS Accession No. ML112620293).

## 2.0 REGULATORY EVALUATION

The regulations in Title 10 of the *Code of Federal Regulations* (10 CFR) 50.36, "Technical specifications," provide the regulatory requirements for the contents in a licensee's TSs. This regulation requires that the TSs include items in the following five specific categories related to station operation. These categories include (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation; (3) SRs; (4) design features; and (5) administrative controls. The regulation does not specify the particular requirements to be included in a plant's TSs. For item (3), 10 CFR 50.36(c)(3) notes that SRs are requirements relating to test, calibration, or inspection to assure that necessary quality of systems and components is maintained.

In general, there are two classes of changes to TS: (1) changes needed to reflect modifications to the design bases (TS are derived from the design basis), and (2) voluntary changes to take advantage of the evolution in policy and guidance as to the required contents and preferred format of TS over time. This amendment deals with the second class of changes. In determining the acceptability of revising TS 3.3.3, "Control Element Assembly Calculators (CEACs)," Required Action B.2.2 and revising the Note to SR 3.3.6.2, the NRC staff used the accumulation of generically approved guidance in NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants, Revision 4.0," dated April 2012 (ADAMS Accession No. ML12102A165) as modified by TSTF-425, "Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5b," dated March 18, 2009 (ADAMS Accession No. ML090850642).

## 3.0 TECHNICAL EVALUATION

The NRC staff has reviewed the licensee's regulatory and technical analyses in support of its proposed license amendment which are described in Section 3 and 4 of the licensee's submittal. The NRC staff's evaluation is provided below:

### 3.1 Reinstate a 4-hour Completion Time in TS 3.3.3, Required Action B.2.2

The proposed change to TS 3.3.3, Required Action B.2.2, reinstates a 4-hour completion time which was inadvertently omitted by the licensee in a LAR dated September 17, 2003, which supported replacement of part length control element assemblies (CEAs) with a new CEA design described as part strength CEA. TS 3.3.3 Required Action B.2.2 states that

Verify all full strength and part strength control element assembly (CEA) groups are fully withdrawn and maintained fully withdrawn, except during Surveillance testing pursuant to SR 3.1.5.3 or for control, when CEA group #5 may be inserted to a maximum of 127.5 inches withdrawn.



When the licensee made an editorial change to TS 3.3.3 in the 2003 LAR, the Completion Time for Required Action B.2.2 (previously numbered B.2) was inadvertently deleted. As a result, the 4-hour completion time was not included for Required Action B.2.2 in proposed changes for Amendment No. 152 issued to the licensee on March 23, 2004 and was not addressed in the safety evaluation issued with Amendment No.152.

The proposed change corrects the unlimited completion time in TS 3.3.3, Required Action B.2.2 by reinstating the 4-hour completion time that existed for Required Action B.2.2 (previously numbered B.2) prior to issuance of Amendment No. 152. This corrective change is conservative and consistent with the 4-hour completion time for the other Required Actions under B.2. Therefore, the NRC staff concludes that this change is acceptable.

### 3.2 Revise a Note within a Surveillance Requirement in TS 3.3.6

The licensee proposes to revise the SR 3.3.6.2 Note for testing actuation logic subgroup relays.

The current Note under SR 3.3.6.2 states that

Relays exempt from testing during operation shall be tested each 18 months.

The revised Note under SR 3.3.6.2 would state that

Relays exempt from testing during operation shall be tested in accordance with the Surveillance Frequency Control Program.

The change would make the Note consistent with the Frequency of SR 3.3.6.2 for testing actuation logic subgroup relays, which states, "In accordance with the Surveillance Frequency Control Program," which was issued with Amendment No. 188 to adopt TSTF-435, in response to the APS LAR dated March 21, 2011 (2011 LAR), as supplemented by letter dated August 12, 2011 (ADAMS Accession Nos. ML11103A053 and ML11235A515, respectively). When implemented, TSTF-425 relocated most periodic frequencies of TS surveillances to a licensee-controlled program, the Surveillance Frequency Control Program (SFCP), and provided requirements for the new program in the Administrative Controls section of the TSs. The proposed change in LAR dated September 27, 2013 (2013 LAR) would result in the frequency of all relay testing required by SR 3.3.6.2 to be controlled by the SFCP. The licensee stated that it was an oversight to not include the surveillance frequency of the Note in SR 3.3.6.2 in the SFCP in the 2011 LAR that requested approval of TS revisions that reflected the relocation of certain periodic surveillance frequencies to the SFCP when TSTF-425 was adopted.

In the 2013 LAR, APS states that the change to SR 3.3.6.2 would align with PVNGS Amendment No. 188 that adopted TSTF-425. Under Amendment No. 188, most periodic frequencies of TS surveillances were relocated to the SFCP in the Administrative Controls section of the TSs except (1) Frequencies that reference other approved programs for the specific interval; (2) Frequencies that are purely event-driven; (3) Frequencies that are event-driven, but have a time component for performing the surveillance on a one-time basis once the event occurs; and (4) Frequencies that are related to specific conditions. The test frequency note within SR 3.3.6.2 is not in any of the above categories, thus the surveillance frequency should have been relocated to the licensee-controlled SFCP in Amendment No. 188. Testing

for actuation logic subgroup relays is still required but the frequency is no longer specified in the TSs. Amendment No. 188 authorized APS to use Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Technical Specification Initiative 5B, Risk-Informed Method for Control of Surveillance Frequencies," dated July 2006 (ADAMS Accession No. ML062570416) for any changes to surveillance frequencies within the SFCP. According to NEI 04-10, probabilistic risk assessment methods are used, in combination with plant performance data and other considerations, to identify and justify modifications to the surveillance frequencies of technical specification required equipment.

The NRC staff has evaluated the licensee's proposed change which would revise SR 3.3.6.2 to be in accordance with the SFCP for ESFAS Logic subgroup relays exempt from testing during operations. The NRC staff has determined that the controls established by NEI 04-10 have been applied to both the surveillance test frequency for subgroup relays tested during operation and subgroup relays not tested during operations under the SFCP. Also, the NRC staff finds that the licensee would continue to meet the regulatory requirement of 10 CFR 50.36(c)(3), by having surveillance requirements to ensure necessary quality of systems and components are maintained, the plant operation is within safety limits, and that the limiting conditions for operation are met. Therefore, the NRC staff concludes that this change is acceptable.

### 3.3 Summary and Conclusions

The NRC staff has reviewed the licensee's proposed change to reinstate a 4-hour completion time, which was inadvertently omitted in the LAR dated September 17, 2003. The NRC staff considers the change to reinstate a 4-hour completion time to be corrective in nature and is consistent with the safety analysis. Therefore, the NRC staff concludes the change is acceptable.

In addition, the NRC staff has reviewed the licensee's proposed change to move the frequency of the SR 3.3.6.2 Note to the licensee-controlled SFCP for actuation logic subgroup relays exempt from testing during operations. The NRC staff concludes the change would make the frequency of the relays exempt from testing controlled in the same manner as the frequency of SR 3.3.6.2 for testing actuation logic subgroup relays. Therefore, the NRC staff concludes the change is acceptable.

### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Arizona State official was notified of the proposed issuance of the amendment. The State official had no comments.

### 5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The

significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding published in the *Federal Register* on February 4, 2014 (79 FR 6640). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

## 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Carl S. Schulten  
Margaret M. Watford

Date: September 9, 2014

R. Edington

- 2 -

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/

Balwant K. Singal, Senior Project Manager  
Plant Licensing Branch IV-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-528, STN 50-529,  
and STN 50-530

Enclosures:

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4. Safety Evaluation

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CSchulten, NRR/DSS/STSB

**ADAMS Accession No. ML14202A378**

\*via SE dated June 25, 2014

OFFICE	NRR/DORL/LPL4-1/PM	NRR/DORL/LPL4-1/PM	NRR/DORL/LPL4-1/LA	NRR/DSS/STSB/BC*
NAME	MWatford	BSingal	JBurkhardt	RElliott
DATE	7/28/14	7/28/14	7/28/14	6/25/14
OFFICE	NRR/DRA/APLA/BC	OGC - NLO	NRR/DORL/LPL4-1/BC(A)	NRR/DORL/LPL4-1/PM
NAME	HHamzehee	MYoung	EOesterle	BSingal
DATE	8/4/14	9/5/14	9/9/14	9/9/14

**OFFICIAL AGENCY RECORD**