



10 CFR 50.90

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102-07144-MLL/TNW
November 25, 2015

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. STN 50-528, 50-529, and 50-530
Change to Degraded Voltage License Amendment Request
Submittal Commitment Date**

During the week of September 8, 2014, the NRC staff performed a focused inspection of an unresolved item regarding the PVNGS degraded voltage protection circuit design and Technical Specification (TS) requirements, including the existing degraded voltage protection relay time delay. As a result of interactions during the inspection, Arizona Public Service Company (APS) made the following commitment to the NRC in APS letter number 102-06948, dated September 26, 2014 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML14276A032):

“APS commits to develop a plant design change and an associated license amendment request (LAR) to shorten the existing time delay in TS surveillance requirement 3.3.7.3(a). It is expected that the design change and LAR will result in the PVNGS degraded voltage protection circuit time delay and TS being aligned with designs generally implemented in the industry. The target date for submittal of the LAR is December 18, 2015.”

In support of this commitment, APS and the NRC participated in a pre-submittal meeting on September 22, 2015 (summarized in ADAMS Accession Number ML15306A235). During the pre-submittal meeting, additional items were identified that involve further engineering review to ensure a comprehensive LAR package. The completion of the engineering reviews and finalization of the LAR require additional time beyond the current commitment target submittal date of December 18, 2015. As a result, the LAR target submittal date in the above commitment is being changed to April 5, 2016.

The additional time permits more detailed assessments of instrument performance histories to finalize the instrument uncertainties accounted for in the proposed modification. The additional time will also permit assessments of the effects of the proposed longer time delay on plant equipment that may be actuated for non-design basis accident events, such as a loss of the main condenser or automatic operation of the auxiliary feedwater system (i.e., anticipated operational occurrences and non-limiting fault events).

A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance

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Finally, APS will be having a third party review performed of the engineering calculations, given the safety significance of the equipment being modified.

Should you need further information regarding this submittal, please contact Thomas N. Weber, Nuclear Regulatory Affairs Department Leader, at (623) 393-5764.

Sincerely,

Lacal, Maria
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cc:	M. L. Dapas	NRC Region IV Regional Administrator
	M. M. Watford	NRC NRR Project Manager for PVNGS
	L. J. Klos	NRC NRR Project Manager
	C. A. Peabody	NRC Senior Resident Inspector for PVNGS