



102-07204-MLL/TNW  
February 25, 2016

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U. S. Nuclear Regulatory Commission  
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Reference: Arizona Public Service Company (APS) letter 102-06982, *Commitment Schedule Changes Related to TSTF-493 and TSTF-523*, dated December 30, 2014, ADAMS Accession No. ML15005A386

Dear Sirs:

Subject: **Palo Verde Nuclear Generating Station (PVNGS)**  
**Units 1, 2, and 3**  
**Docket Nos. STN 50-528, 50-529, and 50-530**  
**Commitment Schedule Change Related to TSTF-493**

The purpose of this letter is to inform the NRC that Arizona Public Service Company (APS) has revised the scheduled completion date related to a regulatory commitment to submit a license amendment request (LAR) for a technical specification (TS) revision documented in the reference letter.

Revision 4 of TSTF-493, *Clarify Application of Setpoint Methodology for LSSS Functions*, was approved by the NRC (75 FR 26294) on May 11, 2010. Option A of TSTF-493 adds notes related to as-found and as-left channel setpoints for applicable surveillance requirements identified in the TSTF. The commitment identified in the reference letter reads follows:

“APS shall submit a license amendment request based on Option A of TSTF-493, *Clarify Application of Setpoint Methodology for Limiting Safety System Settings*, by March 30, 2016. No changes to the allowable values or nominal trip setpoints will be requested in the submittal.”

The schedule for the LAR submittal has been changed to February 28, 2017, such that the commitment now reads as follows:

APS shall submit a license amendment request based on Option A of TSTF-493, *Clarify Application of Setpoint Methodology for Limiting Safety System Settings*, by February 28, 2017. No changes to the allowable values or nominal trip setpoints will be requested in the submittal.

Current station testing procedures implement practices similar to the TS requirements that will be adopted by incorporation of TSTF-493 into the PVNGS TSs. These current practices ensure the objectives of the commitment will continue to be met until the proposed license amendment is implemented.

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The extension of the scheduled commitment completion date is needed to permit completion of other station priorities, such as:

- Submittal of LAR regarding the degraded voltage relay time delay modification consistent with the APS commitment described in letter 102-07144, dated November 25, 2015
- Submittal of an Addendum to Revision 2 of the APS Supplemental Response to Generic Letter 2004-02, *Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors*
- Responses to received or expected NRC Staff requests for additional information (RAIs) regarding LARs that are under review, including the updated criticality safety analysis for fuel storage, the implementation of risk informed completion times (TSTF-505), the updated quality assurance program, and the enhanced emergency action level scheme for emergency planning
- Submittal of LAR to implement TSTF-523, related to Generic Letter 2008-01, *Managing Gas Accumulation*, consistent with the APS commitment described in the referenced letter
- Submittal of the next generation fuel LAR to enhance fuel design

Regulatory Issue Summary (RIS) 2015-16, Revision 1, *Planned Licensing Action Submittals for All Power Reactor Licensees*, dated January 15, 2016, requested licensees to provide the NRC staff with their plans for licensing actions. This commitment change is consistent with the planned submittals that will be provided in the APS response to RIS 2015-16.

Should you have any questions concerning the content of this letter, please contact Thomas Weber, Department Leader, Nuclear Regulatory Affairs, at (623) 393-5764.

Sincerely,

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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