



102-07426-MLL/TNW
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Reference: Arizona Public Service Company letter 102-07204, *Commitment Schedule Change Related to TSTF-493*, dated February 25, 2016 [Agencywide Documents Access and Management System (ADAMS) Accession No. ML16056A594]

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 Change Regarding Adoption of Technical Specifications
Task Force Traveler 493, Revision 4, Clarify Application of Setpoint
Methodology for LSSS Functions**

The purpose of this letter is to inform the Nuclear Regulatory Commission (NRC) that Arizona Public Service Company (APS) has revised a regulatory commitment for submitting a license amendment request (LAR) for a technical specification (TS) revision documented in the reference letter. The commitment change was performed in accordance with APS procedure 93DP-0LC08, *Regulatory Commitment Tracking*, which implements the guidance of NEI 99-04, *Guidelines for Managing NRC Commitment Changes*, which has been endorsed by the NRC staff in Regulatory Information Summary (RIS) 2000-17, *Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff*, dated September 21, 2000.

Revision 4 of Technical Specification Task Force (TSTF) Traveler 493, *Clarify Application of Setpoint Methodology for Limiting Safety System Settings (LSSS) Functions*, was approved by the NRC (75 FR 26294) on May 11, 2010. Option A of TSTF-493 applies notes to functions in the Reactor Protection System (RPS) and Engineered Safety Features Actuation System (ESFAS) specifications. The notes relate to as-found and as-left channel setpoints for the applicable surveillance requirements identified in TSTF-493.

The commitment identified in the reference letter 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*

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Commitment Change Regarding TSTF-493, *Clarify Application of Setpoint Methodology for LSSS Functions*

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Settings, by February 28, 2017. No changes to the allowable values or nominal trip setpoints will be requested in the submittal."

After a review of TSTF-493, Revision 4, APS concludes that the current station surveillance testing procedures implement the notes of Option A of TSTF-493. Similar notes already exist for parameters in the PVNGS TS for the RPS and ESFAS instrumentation, which serve to anchor these practices in surveillance procedures. Specifically, steam generator 1 and 2 – low pressure, in RPS Tables 3.3.1-1 and 3.3.2-1 and ESFAS Table 3.3.5-1, and refueling water storage tank level – low, in ESFAS Table 3.3.5-1 contain similar notes.

APS will continue to implement these current practices to ensure the objectives of TSTF-493 are satisfied, obviating the need for submitting an LAR. The addition of the notes of TSTF-493 to the multitude of instruments in the RPS and ESFAS TS tables would be an administrative effort that complicates the TS tables, from a human factors perspective, with no change in plant operating practice.

The commitment has, therefore, been changed to read as follows:

"The practices described in the notes of TSTF-493, Option A, will be retained in PVNGS surveillance procedures."

No new commitments are made by this letter. Should you have any questions concerning the content of this letter, please contact Michael DiLorenzo, Licensing Section Leader, at (623) 393-3495.

Sincerely,

MLL/TNW/NTA

cc:	K. M. Kennedy	NRC Region IV Regional Administrator
	S. P. Lingam	NRC NRR Project Manager for PVNGS
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