



102-07926-MDD
May 30, 2019

**Palo Verde
Nuclear Generating Station**
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623-393-3495

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Sirs:

Subject: **Palo Verde Nuclear Generating Station Units 1, 2, 3 and Independent Spent Fuel Storage Installation Docket Nos. STN 50-528, 50-529, 50-530, and 72-44 10 CFR 50.59, 10 CFR 72.48, and Commitment Change Annual Reports**

Enclosed please find the Arizona Public Service Company (APS), title 10 of the Code of Federal Regulations (10 CFR) 50.59, 10 CFR 72.48 and Commitment Change reports for January 1, 2018, through December 31, 2018.

In accordance with 10 CFR 50.59(d)(2), APS is providing a brief description and summary of the evaluations required by 10 CFR 50.59(d)(1) for each change completed during the period. Enclosure 1 contains a report of the evaluations written during 2018, regardless of the implementation status of the evaluated action.

In accordance with 10 CFR 72.48(d)(2), APS is reporting that there was no change completed during the period that was required to be reported pursuant to 10 CFR 72.48.

In accordance with the APS commitment management program, APS is reporting one NRC commitment change made during the referenced time period as described in Enclosure 2 to this letter. Other commitment changes made during 2018 that were reported in separate correspondence are not included in Enclosure 2.

No new commitments are being made to the NRC by this letter. Should you need further information regarding this submittal, please contact me at (623) 393-3495.

Sincerely,

Michael, D. DiLorenzo
Department Leader, Nuclear Regulatory Affairs

MDD/TMJ/mg

Enclosure: 1. 10 CFR 50.59 and 10 CFR 72.48 Reports, January 2018 – December 2018
2. Commitment Change Reports, January 2018 – December 2018

Enclosure 1

10 CFR 50.59 and 10 CFR 72.48 Reports

January 2018 - December 2018

PVNGS 10 CFR 50.59 and 10 CFR 72.48 Reports (January 2018 through December 2018)

| Log | Doc Type | Doc Number | Description | Summary |
|--------------------------------|-----------------------------|--|---|--|
| 50.59 E-17-0002 Rev. 000 | SDOC CALC EDC DMWO | SDOC N001-1900-01394 SDOC N001-0205-00154 CALC 13-NC-ZY-0251 EDC 2015-00633 for CALC 13-NC-ZY-0263 | It addresses changes to radiological consequences design analyses resulting from the Westinghouse Next Generation Fuel (NGF) modification. The NGF modification will be implemented under DMWO 4557156 and will replace Current Value Added Fuel with new Westinghouse NGF. | This change does not require prior NRC approval in accordance with 10 CFR 50.59(c)(1). Note: NGF has been approved by the NRC safety evaluation, see ML17319A107. |
| 50.59 E-18-0001 Rev. 000 | DMWO LDCR | DMWO 4411244 LDCR 15-B011, 15-F029 | It addresses installation of Open Phase Protection System monitoring and detection for each of PVNGS' three non-class 1E start-up transformers to identify an open phase condition. | This change does not require prior NRC approval in accordance with 10 CFR 50.59(c)(1). |

Note: There was no 10 CFR 72.48 change completed during the 2018 period that required to be reported

Acronyms/Abbreviation List

| | | |
|------|---|-----------------------------------|
| CALC | - | Calculation |
| DMWO | - | Design Modification Work Order |
| EDC | - | Engineering Document Change |
| LDCR | - | Licensing Document Change Request |
| SDOC | - | Supplier Document |

Enclosure 2

Commitment Change Reports

January 2018 – December 2018

COMMITMENT CHANGE 18-C001

Commitment Number: Regulatory Commitment Tracking System Action Item (RCTSAI) 12022

Source Document:
Engineering Evaluation 18-01941-004

Existing Commitment Description:

Provide Preventative Maintenance (PM) tasks for Calibration of the Class 1E Switchgear Undervoltage (UV) and Diesel Generator Protective Relays every two years.

Revised Commitment Description:

Provide PM tasks for calibration of the Emergency Diesel Generator (EDG) protective relays that are bypassed in the emergency mode every four years (4A). Calibration PM tasks for the Class 1E Switchgear UV and Diesel Generator Protective Quality Related (Q) Relays will remain at every two years (2A).

Justification of Change:

Reason for the change:

Based on the following, the modification of RCTSAI 12022 to allow a calibration interval of 4A for the EDG generator protective relays that are bypassed in the emergency mode should be approved:

- Bypassed during EDG emergency mode operations and have no impact to EDG safety function
- Protective relays are for equipment protection only during testing which is about 100 hours/year
- Any minor expected increase drift from setpoint between calibrations resulting from an increase PM interval will not impact equipment protection if trip functions are maintained
- Performed reliably in-service over an extended period at PVNGS
- Within industry PM guidelines for electro-mechanical style generator protective relays

The "Generator Differential" (87) protective relay is Class Q, is an emergency mode trip and can cause a loss of EDG safety function, therefore, its calibration interval shall remain at current 2A.