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Nuclear Generating Station
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102-08087-MDD/MSC
April 14, 2020

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 50-528/529/530
2019 Annual Environmental Operating Report

Enclosed please find the 2019 Annual Environmental Operating Report for PVNGS Units 1, 2, and 3. Arizona Public Service Company is submitting this report pursuant to Section 5.4.1 of Appendix B to the PVNGS Units 1, 2, and 3 Renewed Operating License Nos. NPF-41, NPF-51, and NPF-74, respectively.

No new commitments are being made to the NRC by this letter.

Should you need further information regarding this submittal, please contact Matthew S. Cox, Licensing Section Leader, at (623) 393-5753.

Sincerely,

Dilorenzo, Michael D(Z99838)

Digitally signed by Dilorenzo, Michael D(Z99838)
DN: cn=Dilorenzo, Michael D(Z99838)
Reason: I am approving this document
Date: 2020.04.14 12:00:37 -07'00'

Michael D. DiLorenzo
Department Leader, Regulatory Affairs

MDD/MSC/mg

Enclosure: Palo Verde Nuclear Generating Station Units 1, 2, and 3
2019 Annual Environmental Operating Report

cc: S. A. Morris NRC Region IV Regional Administrator
S. P. Lingam NRC NRR Project Manager for PVNGS
C. A. Peabody NRC Senior Resident Inspector for PVNGS

Enclosure

Palo Verde Nuclear Generating Station
Units 1, 2, and 3
2019 Annual Environmental Operating Report

I. INTRODUCTION

Palo Verde Nuclear Generating Station (PVNGS) is located in Maricopa County, Arizona, approximately 50 miles west of the Phoenix metropolitan area. The PVNGS site comprises approximately 4,280 acres. Site elevations range from 890 feet above mean sea level at the southern boundary to 1,030 feet above mean sea level at the northern boundary. The station consists of three pressurized water reactor electrical generating units. Units 1, 2, and 3 have a rated thermal power of 3,990 MW.

Arizona Public Service (APS) was issued low power operating licenses NPF-34, NPF-46 and NPF-65 for Units 1, 2, and 3 by the United States Nuclear Regulatory Commission (NRC) on December 31, 1984, December 9, 1985, and March 25, 1987, respectively. APS was issued full power operating licenses NPF-41, NPF-51 and NPF-74 for Units 1, 2, and 3 on June 1, 1985, April 24, 1986, and November 25, 1987, respectively. These licenses were renewed on April 21, 2011.

Appendix B to these operating licenses is entitled the *Environmental Protection Plan* (*Non-Radiological*). The environmental protection plans (EPP) for each of the current operating licenses are identical.

The purpose of the EPP is to provide for the protection of environmental values during the construction and operation of the nuclear facility. The principal objectives of the EPP are as follows:

(1) Verify that the station is operated in an environmentally acceptable manner, as established by the final environmental statement (FES) and other NRC environmental impact assessments.

(2) Coordinate NRC requirements and maintain consistency with other federal, state and local requirements for environmental protection.

(3) Keep the NRC informed of the environmental effects of facility construction and operation and actions taken to control those effects.

This Annual Environmental Operating Report is required by Section 5.4.1 of the EPP which is Appendix B of the respective renewed operating licenses. This report describes the activities related to the PVNGS EPP during the 2019 calendar year. For purposes of this report, references to the EPP are considered to be the EPP of NPF-41, NPF-51, and NPF-74.

II. ENVIRONMENTAL MONITORING SUMMARIES AND ANALYSIS

A. Cultural Resources

Section 4.2.1 of the EPP requires that an archaeological survey be performed when final alignment of the PVNGS-to-Saguaro transmission line is completed. As of the date of this report, plans for this transmission line have been indefinitely suspended. Therefore, there has been no activity with regard to this requirement of the EPP.

B. Terrestrial Ecology Monitoring

Section 4.2.2 of the EPP states that APS will implement a salt deposition and impact monitoring program as communicated in a letter to the NRC dated December 30, 1991 (Reference 1), the salt deposition monitoring program was discontinued at the end of 1991.

III. PLANT DESIGN AND OPERATION CHANGES

Section 3.1 of the EPP allows changes in station design, operation, or the performance of tests or experiments affecting the environment provided that such changes, tests, or experiments do not involve an unreviewed environmental question and do not involve a change to the EPP. Changes, tests, or experiments in which all measurable non-radiological effects are confined to the onsite areas previously disturbed during site preparation and plant construction or in which the environment is not affected are exempt from the evaluation and reporting requirements of Section 3.1.

Section 3.2 of the EPP also exempts changes, tests, or experiments which are required to comply with other federal, state, or local environmental regulations.

No design and operational changes were initiated in 2019 that required an evaluation to determine if they involved either an unreviewed environmental question or constituted a change in the EPP.

IV. EPP NON-COMPLIANCES

There were no instances of non-compliance with the EPP identified during 2019.

V. NON-ROUTINE REPORTS

There were no non-routine reports required by Section 5.4.2 of the EPP during 2019.

VI. REFERENCES

1. Letter from W.F. Conway (APS) to U.S. NRC, *Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2, and 3*, *Salt Deposition and Impact Monitoring Plan*, dated December 30, 1991 [NRC Agencywide Documents Access and Management System (ADAMS) Accession Number 9201070077]