



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

September 1, 2021

Mrs. Maria Lacal, Executive Vice President
/ Chief Nuclear Officer
Arizona Public Service Company
P.O. Box 52034, MS 7602
Phoenix, AZ 85072-2034

SUBJECT: UPDATED INSPECTION PLAN FOR PALO VERDE NUCLEAR GENERATING STATION – UNITS 1, 2 AND 3 (REPORT 05000528/2021005, 05000529/2021005, AND 05000530/2021005)

Dear Mrs. Lacal:

The enclosed inspection plan lists the inspections scheduled through June 30, 2023, for Palo Verde Nuclear Generating Station. The U.S. Nuclear Regulatory Commission (NRC) provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last twelve months of the inspection plan are tentative and may be revised. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes.

In response to the COVID-19 public health emergency (PHE), the NRC is adjusting inspection plans and schedules in order to safeguard the health and safety of both NRC and licensee staff while still effectively implementing the Reactor Oversight Process (ROP). Each planned inspection is being carefully reviewed in order to determine if any portions of the inspection can be performed remotely, determine how best to perform on-site portions to minimize personnel health risks, and adjust inspection schedules if needed. This is done in accordance with guidance contained in the February 1, 2021 memo, "Calendar Year 2021 Inspection Guidance During COVID-19 Telework Restrictions" located in the NRC's Agencywide Documents Access and Management System (ADAMS) (ADAMS Accession No. ML21027A274). For inspections requiring extensive coordination with offsite organizations, such as evaluated emergency preparedness exercises, NRC guidance and frequently asked questions for security and emergency preparedness can be found here: <https://www.nrc.gov/about-nrc/covid-19/security-ep/>. Similarly, the NRC has developed guidance if force-on-force inspections cannot be completed as scheduled due to an emergency, such as the COVID-19 PHE. These changes help ensure the health and safety of both NRC and licensee staff while maintaining the NRC's important safety and security mission during the COVID-19 PHE. The attached inspection plan is accurate on the date of issuance but remains subject to change based on approval of potential exemption requests or other changes needed due to changing conditions in the COVID-19 PHE. NRC staff will contact your appropriate regulatory affairs staff in order to coordinate inspection planning and scheduling.

The NRC will also be performing baseline inspections of licensee cyber security programs. The specific schedule and procedure to be used for these inspections is being developed by the NRC staff. The staff expects to communicate the schedule for these inspections to each utility separately.

Additionally, during this period the NRC will perform an additional inspection per a revised version Temporary Instruction (TI) 2515/194, "Inspection of the Licensee's Implementation of Industry Initiative Associated with the Open Phase Condition Design Vulnerability in Electrical Power Systems (NRC Bulletin 2012-01)" for any sites who elect to implement the guidance of the Industry Initiative on Open Phase Condition, Revision 3 (ADAMS Accession No. ML19163A176), which included an option for relying on annunciation and operator manual actions instead of automatic protective features to isolate a power supply affected by an open phase condition. Licensees will be individually notified when the NRC schedules these inspections.

On November 17, 2020, the NRC issued Confirmatory Order EA-20-054 (ADAMS Accession No. ML20323A035), which was associated with your facility's failure to properly evaluate changes to the onsite dry cask storage system and the failure to adequately analyze the consequences of a hypothetical spent fuel cask tip-over accident. The Regional Administrator has approved the staff's plan to conduct a follow-up inspection of planned Confirmatory Order actions in accordance with Inspection Procedure 92702, "Followup on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, Confirmatory Orders, And Alternative Dispute Resolution Confirmatory Orders." The NRC will coordinate with your staff to schedule these inspection activities in 2022.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of ADAMS and is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact me at (817) 200-1574 with any questions you have regarding this letter.

Sincerely,

John L. Dixon, Jr., Chief
Reactor Projects Branch D
Division of Reactor Projects

Docket Nos. 05000528, 05000529,
and 05000530
License Nos. NPF-41, NPF-51, and NPF-74

Enclosure:
Inspection Plan

cc w/ encl: Distribution via LISTSERV®

UPDATED INSPECTION PLAN FOR PALO VERDE NUCLEAR GENERATING STATION – UNITS 1, 2 AND 3 (REPORT 05000528/2021005, 05000529/2021005, AND 05000530/2021005) – DATED SEPTEMBER 1, 2021

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 ROP Reports
 ROPassessment.Resource@nrc.gov.

ADAMS ACCESSION NUMBER:

SUNSI Review ADAMS: Non-Publicly Available Non-Sensitive Keyword:
 By: ASanchez Yes No Publicly Available Sensitive NRC-002

OFFICE	SPE: DRP/D	BC: DRP/D		
NAME	ASanchez	JDixon		
SIGNATURE	AAS	JLDJ		
DATE	08/18/2021	09/01/2021		

IP 22b Site Inspection Activity Plan

07200044 - Palo Verde (ISFSI)

07/01/2021 - 06/30/2023

Unit	Start	End	Activity	CAC	Title	Staff Count
ISFSI Security Inspection - IP 81311						1
1	8/23/2021	8/26/2021	IP 81311	001006	Physical Security Requirements for Independent Spent Fuel Storage Installations	
Palo Verde ISFSI Confirmatory Order Follow-up Inspection (Part 72)						2
1	10/1/2022	11/30/2022	IP 92702 CONF	001701	Enforcement Related Order Follow-Up-Only	
1	10/1/2022	11/30/2022	IP 92703	001019	Followup of Confirmatory Action Letters or Orders	

IP 22b Site Inspection Activity Plan

Palo Verde

07/01/2021 - 06/30/2023

Unit	Start	End	Activity	CAC	Title	Staff Count
Security Access Authorization .01 and Access Control .02 w/PIV						2
1, 2, 3	8/23/2021	8/27/2021	IP 71130.01	000733	Access Authorization	
1, 2, 3	8/23/2021	8/27/2021	IP 71130.02	000734	Access Control	
1, 2, 3	8/23/2021	8/27/2021	IP 71130.09	001656	Security Plan Changes	
1, 2, 3	8/23/2021	8/27/2021	IP 71151	001338	Performance Indicator Verification	
Security FFD .08						1
1, 2, 3	8/23/2021	8/27/2021	IP 71130.08	000740	Fitness For Duty Program	
TI 2515/194 - PV						2
1, 2, 3	9/12/2021	9/18/2021	TI 2515/194	000512	Inspection of the Licensee's Implementation of Industry Initiative Associated With the Open Phase Condition Design Vulnerabilities In Electric Power Systems (NRC Bulletin 2012-01)	
RP 1,2,3,PI						2
1, 2, 3	10/18/2021	10/22/2021	IP 71124.01	000725	Radiological Hazard Assessment and Exposure Controls	
1, 2, 3	10/18/2021	10/22/2021	IP 71124.02	000726	Occupational ALARA Planning and Controls	
1, 2, 3	10/18/2021	10/22/2021	IP 71124.03	000727	In-Plant Airborne Radioactivity Control and Mitigation	
FORCE-ON-FORCE PLANNING AND EXERCISE WEEKS - PV						6
1, 2, 3	1/10/2022	1/14/2022	IP 71130.03	000735	Contingency Response - Force-On-Force Testing	
1, 2, 3	1/31/2022	2/4/2022	IP 71130.03	000735	Contingency Response - Force-On-Force Testing	
Design Bases Assurance Inspection (Team) - 21M - Palo Verde						6
1, 2, 3	2/28/2022	3/18/2022	IP 71111.21M	000713	Design Bases Assurance Inspection (Teams)	
EP Program and PI Inspection - PV						1
1, 2, 3	2/28/2022	3/4/2022	IP 71114.02	000717	Alert and Notification System Testing	
1, 2, 3	2/28/2022	3/4/2022	IP 71114.03	000718	Emergency Response Organization Staffing and Augmentation System	
1, 2, 3	2/28/2022	3/4/2022	IP 71114.04	000719	Emergency Action Level and Emergency Plan Changes	
1, 2, 3	2/28/2022	3/4/2022	IP 71114.05	000720	Maintenance of Emergency Preparedness	
1, 2, 3	2/28/2022	3/4/2022	IP 71151	001397	Performance Indicator Verification	
Access Control .02						1
1, 2, 3	2/28/2022	3/4/2022	IP 71130.02	000734	Access Control	
1, 2, 3	2/28/2022	3/4/2022	IP 71130.09	001656	Security Plan Changes	
1, 2, 3	2/28/2022	3/4/2022	IP 71151	001338	Performance Indicator Verification	
PV 2022 INITIAL EXAM						5
1, 2, 3	3/27/2022	4/2/2022	OV	000956	FB-OR-ONSITE VALIDATION OF INITIAL LICENSE EXAMINATION (OV)	
1, 2, 3	5/1/2022	5/7/2022	EXAD	000500	FB-OR-INITIAL LICENSE EXAM ADMINISTRATION (EXAD)	
Inservice Inspection 1RF23 - PV						1

IP 22b Site Inspection Activity Plan

1	4/11/2022	4/22/2022	IP 71111.08P	000702	Inservice Inspection Activities (PWR)	
RP 1,2,PI						2
1, 2, 3	4/18/2022	4/22/2022	IP 71124.01	000725	Radiological Hazard Assessment and Exposure Controls	
1, 2, 3	4/18/2022	4/22/2022	IP 71124.02	000726	Occupational ALARA Planning and Controls	
RP 6,7						2
1, 2, 3	5/16/2022	5/20/2022	IP 71124.06	000730	Radioactive Gaseous and Liquid Effluent Treatment	
1, 2, 3	5/16/2022	5/20/2022	IP 71124.07	000731	Radiological Environmental Monitoring Program	
RP 2,4						2
1, 2, 3	6/6/2022	6/10/2022	IP 71124.02	000726	Occupational ALARA Planning and Controls	
1, 2, 3	6/6/2022	6/10/2022	IP 71124.04	000728	Occupational Dose Assessment	
MC&A						1
1, 2, 3	6/6/2022	6/10/2022	IP 71130.11	000742	Material Control and Accounting (MC&A)	
Security Training/Equip Maint .07 and .04						2
1, 2, 3	9/12/2022	9/16/2022	IP 71130.04	000736	Equipment Performance, Testing, and Maintenance	
1, 2, 3	9/12/2022	9/16/2022	IP 71130.07	000739	Security Training	
PV 2022 BRQ						3
1, 2, 3	9/25/2022	10/1/2022	IP 71111.11B	000704	Licensed Operator Requalification Program and Licensed Operator Performance	
Palo Verde ISFSI Confirmatory Order Follow-up Inspection (Part 50) Feeder for Residents' report						2
1, 2, 3	10/1/2022	10/2/2022	IP 92702	001555	Follow-Up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, and Orders	
1, 2, 3	10/1/2022	10/2/2022	IP 92702 CONF	001701	Enforcement Related Order Follow-Up-Only	
Inservice Inspection 3RF23 - PV						1
3	10/10/2022	10/21/2022	IP 71111.08P	000702	Inservice Inspection Activities (PWR)	
Cyber Security Inspection - PV						4
1, 2, 3	12/5/2022	12/9/2022	IP 71130.10P	000741	Cyber Security	
Heat Exchanger/Sink Performance Inspection - 07T - Palo Verde						2
1, 2, 3	1/1/2023	6/30/2023	IP 71111.07T	000700	Heat Sink Performance	
10 CFR 50.59 Inspection - 17T - Palo Verde						3
1, 2, 3	1/1/2023	6/30/2023	IP 71111.17T	000709	Evaluations of Changes, Tests, and Experiments	
EP 2023 Exercise Scenario In-Office Rvw 71114.08 - PV						4
1, 2, 3	1/1/2023	2/7/2023	IP 71114.08	000723	Exercise Evaluation □ Scenario Review	
Security FFD .08						1
1, 2, 3	1/23/2023	1/27/2023	IP 71130.08	000740	Fitness For Duty Program	
EP 2023 Biennial Exercise & PI Inspection						4
1, 2, 3	3/6/2023	3/10/2023	IP 71114.01	000716	Exercise Evaluation	

IP 22b Site Inspection Activity Plan

1, 2, 3	3/6/2023	3/10/2023	IP 71114.04	000719	Emergency Action Level and Emergency Plan Changes	
1, 2, 3	3/6/2023	3/10/2023	IP 71151	001397	Performance Indicator Verification	
Inservice Inspection 2R24						1
2	4/10/2023	4/21/2023	IP 71111.08P	000702	Inservice Inspection Activities (PWR)	
RP 1,3,PI						2
1, 2, 3	4/17/2023	4/21/2023	IP 71124.01	000725	Radiological Hazard Assessment and Exposure Controls	
1, 2, 3	4/17/2023	4/21/2023	IP 71124.03	000727	In-Plant Airborne Radioactivity Control and Mitigation	
PV 2023 INITIAL EXAM						6
1, 2, 3	3/26/2023	4/1/2023	OV	000956	FB-OR-ONSITE VALIDATION OF INITIAL LICENSE EXAMINATION (OV)	
1, 2, 3	4/30/2023	5/6/2023	EXAD	000500	FB-OR-INITIAL LICENSE EXAM ADMINISTRATION (EXAD)	
Palo Verde Biennial PI&R						4
1, 2, 3	6/26/2023	6/30/2023	IP 71152B	000747	Problem Identification and Resolution	