



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

October 13, 2022

Mr. Adam Heflin
Executive Vice President
and Chief Nuclear Officer
Arizona Public Service Company
P.O. Box 52304, MS 7602
Phoenix, AZ 85072-2034

SUBJECT: PALO VERDE NUCLEAR GENERATING STATION – SECURITY BASELINE
INSPECTION REPORT 05000528/2022403 AND 05000529/2022403 AND
05000530/2022403

Dear Mr. Heflin:

On September 27, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Palo Verde Nuclear Generating Station. On September 27, 2022, the NRC inspectors discussed the results of this inspection with Mr. E. Pittman, Director Emergency Services, and other members of your staff. The results of this inspection are documented in the enclosed report.

No findings or violations of more than minor significance were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

A handwritten signature in cursive script that reads "Ray Kellar".

Signed by Kellar, Ray
on 10/13/22

Ray L. Kellar, P.E., Chief
Physical Security Branch
Division of Radiological Safety & Security

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

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

PALO VERDE NUCLEAR GENERATING STATION – SECURITY BASELINE INSPECTION
 REPORT 05000528/2022403 AND 05000529/2022403 AND 05000530/2022403 DATED
 OCTOBER 13, 2022

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<input checked="" type="checkbox"/> SUNSI Review		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive		<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available	
OFFICE	PSB: DRSS	PSB: DRSS	PSB: DRSS	DORS: PBD	PSB: DRSS
NAME	Hostetter, D.	Buchanan, J.	Kellar, R.	Dixon, J.	Kellar, R.
DATE	9/28/2022	9/28/2022	10/13/2022	10/12/2022	10/13/2022

**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Numbers: 05000528, 05000529 and 05000530

License Numbers: NPF-41, NPF-51 and NPF-74

Report Numbers: 05000528/2022403, 05000529/2022403 and 05000530/2022403

Enterprise Identifier: I-2022-403-0007

Licensee: Arizona Public Service

Facility: Palo Verde Nuclear Generating Station

Location: Tonopah, AZ

Inspection Dates: September 12, 2022 to September 27, 2022

Inspectors: J. Buchanan, Physical Security Inspector
N. Cuevas, Resident Inspector
D. Hostetter, Physical Security Inspector
C. Jewett, Physical Security Inspector
E. Lantz, Resident Inspector
L. Merker, Senior Resident Inspector

Approved By: Ray L. Kellar, P.E., Chief
Physical Security Branch
Division of Radiological Safety & Security

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a security baseline inspection at Palo Verde Nuclear Generating Station, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2201, "Security Inspection Program for Commercial Nuclear Power Reactors." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

SAFEGUARDS

71130.04 - Equipment Performance, Testing, and Maintenance

The inspectors evaluated the security equipment testing and maintenance program. The following elements were evaluated from this IP, dated January 1, 2019.

Equipment Performance, Testing, and Maintenance (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: All Requirements
 - Tier III: All Requirements

71130.07 - Security Training

The inspectors evaluated the security training program through completion of the following procedure elements:

Security Training (1 Sample)

- (1)
 - Tier I: All Requirements (02.03 d, e, non-applicable)
 - Tier II: All Requirements
 - Tier III: All Requirements (02.14 a, b, and c, non-applicable)

71130.14 - Review of Power Reactor Target Sets

The inspectors evaluated the security target set program. The following elements were evaluated:

Review of Power Reactor Target Sets (1 Sample)

- (1) 02.01, 02.02 (a-e, f non-applicable), 02.03 (non-applicable), 02.04 (a-b), 02.05

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On September 27, 2022, the inspectors presented the security baseline inspection results to Mr. E. Pittman, Director, Emergency Services Division, and other members of the licensee staff.
- On September 27, 2022, the inspectors presented the target set inspection results to Mr. E. Pittman, Director Emergency Services, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.04	Corrective Action Documents		22-06918, 22-07374, 22-07396, 22-07502, 22-07513, 22-07551, 22-07970, 22-08031, 22-08139, 22-08208, 22-08251, 22-08422, 22-08668, 22-08683, 22-08775. 22-09521, AND 22-09659.	
	Corrective Action Documents Resulting from Inspection		22-09617 AND 22-09692	
	Miscellaneous		Quarterly Delay Netting, Doors, Tools, and Slider Testing	06/09/2022
			Security Tour Equipment Checks	05-01/2022 thru 05/10/2022
			Palo Verde Nuclear Generating Station Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program.	23
			Performance Indicators	10/01/2021 thru 06/30/2022

Inspection Procedure	Type	Designation	Description or Title	Revision or Date	
			Protected Area Intrusion Detection Performance Testing	03/07/2022 thru 03/31/2022	
			SOCA Access Facility Turnstile Performance Testing	03/31/2022	
			Protected Area Perimeter Intrusion Detection System Performance Testing	09/02/2021	
			Protected Area Perimeter Intrusion Detection System, CCTV and PTZ Operability Testing	09/07/2021	
			Proximity Reader, BMS and Turnstile Testing	09/16/2021 thru 09/30/2021	
			SOCA Access Facility Turnstile Performance Testing	09/12/2021	
			SOCA Pop-Up Barrier and PA Vehicle Delay Barrier Performance Testing	09/08/2021	
			Hardened Barrier Door Performance Testing	09/08/2021	
			PASE Perimeter Intrusion Detection System Operability Testing	04/05/2022 thru 04/26/2022	
			SOCA Checkpoint - Outbound Gate Intrusion Detection System Operability Testing.	03/02/2022 thru 04/06/2022	
			SOCA Perimeter Intrusion Detection System Intrusion Detection System Operability Testing	03/03/2022 thru 04/27/2022	
			Alarm/Event Condition Report	09/13/2022	
		Procedures	01DP-0AP12	Condition Reporting Process	15
			20DP-0SK28	Security Weapons and Equipment Control	35
			20DP-0SK70	Security Ingress Equipment Testing	2
20DP-0SK71	Security Perimeter Intrusion Detection System Testing		9		
20DP-0SK72	Security Doors, Hatches, and Turnstiles Testing		3		
20DP-0SK77	Security Miscellaneous Testing		1		
20DP-0SK99	SOCA Access Facility (SAF) - Post 1		8		
20SP-0SK32	Security CAS/SAS Operations		47		
77OP-0SK03	Maintenance of Plant Security Systems Components		1		

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Self-Assessments	22-05653		
	Work Orders	4967363	Outdoor Microwave Link Receiver Zone 133	10/07/2019
		5135918	Perform Annual Security UPS & Battery Inspection	08/20/2020
		5195732	Outdoor Microwave Link Receiver Zone	04/26/2021
		5245350	Security Building Basement	11/11/2021
		5245350	Perform Annual Security UPS & Battery Inspection	11/11/2021
		5267484	Security Diesel Generator	11/17/2021
		5294535	Security Diesel Generator	02/15/2022
		5304307	SOCA Tamper PM Loop A/B	04/01/2022
		5316963	Perform Loss of Power Test for the Security Diesel	05/18/2022
		5343644	Perform Loss of Power Test for the Security Diesel	08/31/2022
		5344969	Perform Annual Security UPS & Battery Inspection	08/25/2022 thru 11/11/2021
		5420644	Alarm Station Cameras	02/17/2022
		5434939	Communications Cabinet	08/04/2022
		5467908	Badging Workstation	08/23/2022
		5468177	Excessive Number of Intrusion Alarms	09/09/2022
5468700	Diesel Generator Train A Missile Door	08/24/2022		
71130.07	Corrective Action Documents	Condition Reports	20-05578, 20-11505, 20-11994, 20-16399, 21-03298, 21-11219, 21-13882, 22-06868, 22-06871, 22-06883, 22-08636	Multiple
	Corrective Action Documents Resulting from Inspection	Condition Reports	22-09613, 22-09615, 22-09686, 22-09694, 22-09698	Multiple
	Miscellaneous	ESD-01	Physical Agility	Version 2
		ESD-07	Tactical Firearms Qualification	08/18/2022
		ESD-30	Familiarization Firearms Enhancement Course	08/18/2022
		ESD-31	Familiarization Firearms Enhancement	08/18/2022
		ESD-86-06	Power to Arrest, Authority to Detain, and Handcuffing	Revision 0
		ESD-86-08	Pepper Spray	Revision 4
		ESD-86-18	Use of Force	Revision 4
	ESD-86-33	Security Access Facility	Revision 4	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		ESD-86-34	Security Owner Controlled Area (SOCA Checkpoint)	Revision 5
		ESD-86-48	Rifle	Revision 0
		ESD-86-49	Handgun	Revision 0
		Familiarization Fire Course	Universal Thermal Mono-Sight	01/07/2022
		PVGS Appendix B	Day Fire Pistol Course	08/06/2020
		PVGS Appendix B	Day Rifle Course	08/06/2020
		PVGS Appendix B	Night Fire Pistol Course	01/06/2022
		PVGS Appendix B	Night Fire Rifle Course	01/06/2022
		Task Performer Evaluator	Instructor/Job Familiarization Guide	11/01/2018
	Procedures	20DP-0SK28	Security Weapons, & Equipment Control	Revision 35
		20DP-0TR01	Security Personnel Training	Revision 28
		20DP-0TR02	Conduct of Security Training	Revision 21
		20DP-0TR03	Security Training Fire Range Operations	Revision 5
		84DP-0RM30	Record Management Control	Revision 35
	Physical Security Plan	PVNGS Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation	Revision 23	
	Self-Assessments	NRC Security Baseline Inspection Readiness Assessment Checklist	Self-Assessment (22-05652)	06/04/2022
	71130.14	Corrective Action Documents		17-17929, 19-04591, 19-06510, 19-08882, 19-12038, 19-13608, 20-01522, 20-02657, 20-12420, 21-06647, 21-11784, 22-06616, 22-07289
Corrective Action Documents			22-10066, 22-10067	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Resulting from Inspection			
	Miscellaneous		PVNGS Target Sets	2
			Palo Verde Nuclear Generating Station Target Set Basis	1
			PVNGS Design Basis Manual Safety Injection System	41
		13-CH-003	Palo Verde Nuclear Generating Station Controls Analysis Package Chemical & Volume Control System Units 1, 2, 3 Group 3, Transmitters	0
		13-NS-C096	Internal Flooding PRA - Characterization of Flood Scenarios	3
		OMA-CH-03	Palo Verde Generating Station Ongoing Monitoring and Assessment (OM&A) Report Chemical & Volume Control System (CH) Units 1, 2, 3 Group 3, Transmitters	0
	Procedures	20DP-0SK51	Target Set Development	6
		21SP-0SK11	Security Contingencies	60
		40AO-9ZZ24	Deliberate Acts Against PVNGS	32
		40DP-9OP20	Watch Standing Practices	49
		40EP-9EO11	Lower Mode Functional Recovery	38