UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 14, 2024

Adam Heflin
Executive Vice President/
Chief Nuclear Officer
Mail Station 7605
Arizona Public Service Company
P.O. Box 52034
Phoenix, AZ 85072-2034

SUBJECT: PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3 – ISSUANCE OF AMENDMENT NOS. 222, 222, AND 222 RE: REVISION TO TECHNICAL SPECIFICATIONS TO ADOPT TSTF-266-A, REVISION 3 (EPID L-2023-LLA-0071)

Dear Adam Heflin:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 222 to Renewed Facility Operating License No. NPF-41, Amendment No. 222 to Renewed Facility Operating License No. NPF-51, and Amendment No. 222 to Renewed Facility Operating License No. NPF-74 for the Palo Verde Nuclear Generating Station, Units 1, 2, and 3 (Palo Verde), respectively. These amendments consist of changes to the technical specifications (TSs) in response to your application dated May 12, 2023.

The amendments revise the Palo Verde TSs to adopt Technical Specification Task Force (TSTF) Traveler TSTF-266-A, Revision 3, “Eliminate the Remote Shutdown System Table of Instrumentation and Controls.” Specifically, Arizona Public Service Company (the licensee) proposed to delete TS table 3.3.11-1, “Remote Shutdown System Instrumentation and Controls,” from Palo Verde TS 3.3.11, “Remote Shutdown System.” The licensee would place the content of TS table 3.3.11-1 into licensee-controlled documents.

A copy of the related safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's monthly *Federal Register* notice.

Sincerely,

/RA/

William Orders, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-528, STN 50-529,
and STN 50-530

Enclosures:
1. Amendment No. 222 to NPF-41
2. Amendment No. 222 to NPF-51
3. Amendment No. 222 to NPF-74
4. Safety Evaluation

cc: Listserv

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ARIZONA PUBLIC SERVICE COMPANY, ET AL.

DOCKET NO. STN 50-528

PALO VERDE NUCLEAR GENERATING STATION, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 222
License No. NPF-41

1. The Nuclear Regulatory Commission (the Commission) has found that:

A. The application for amendment by the Arizona Public Service Company (APS or the licensee) on behalf of itself and the Salt River Project Agricultural Improvement and Power District, El Paso Electric Company, Southern California Edison Company, Public Service Company of New Mexico, Los Angeles Department of Water and Power, and Southern California Public Power Authority dated May 12, 2024, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations set forth in 10 CFR Chapter I;

B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Renewed Facility Operating License No. NPF-41 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 222, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this renewed operating license. APS shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan, except where otherwise stated in specific license conditions.

3. This license amendment is effective as of the date of issuance and shall be implemented within 90 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Jennivine K. Rankin

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Date: 2024.06.14 09:13:35 -04'00'

Jennivine K. Rankin, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to Renewed Facility
Operating License No. NPF-41
and the Technical Specifications

Date of Issuance: June 14, 2024

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ARIZONA PUBLIC SERVICE COMPANY, ET AL.

DOCKET NO. STN 50-529

PALO VERDE NUCLEAR GENERATING STATION, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 222
License No. NPF-51

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by the Arizona Public Service Company (APS or the licensee) on behalf of itself and the Salt River Project Agricultural Improvement and Power District, El Paso Electric Company, Southern California Edison Company, Public Service Company of New Mexico, Los Angeles Department of Water and Power, and Southern California Public Power Authority dated May 12, 2023, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Renewed Facility Operating License No. NPF-51 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 222, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this renewed operating license. APS shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan, except where otherwise stated in specific license conditions.

3. This license amendment is effective as of the date of issuance and shall be implemented within 90 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Jennivine K. Rankin

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Jennivine K. Rankin, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to Renewed Facility
Operating License No. NPF-51
and the Technical Specifications

Date of Issuance: June 14, 2024

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ARIZONA PUBLIC SERVICE COMPANY, ET AL.

DOCKET NO. STN 50-530

PALO VERDE NUCLEAR GENERATING STATION, UNIT 3

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 222
License No. NPF-74

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by the Arizona Public Service Company (APS or the licensee) on behalf of itself and the Salt River Project Agricultural Improvement and Power District, El Paso Electric Company, Southern California Edison Company, Public Service Company of New Mexico, Los Angeles Department of Water and Power, and Southern California Public Power Authority dated May 12, 2023, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Renewed Facility Operating License No. NPF-74 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 222, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this renewed operating license. APS shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan, except where otherwise stated in specific license conditions.

3. This license amendment is effective as of the date of issuance and shall be implemented within 90 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Jennivine K. Rankin

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Date: 2024.06.14 09:15:44 -04'00'

Jennivine K. Rankin, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to Renewed Facility
Operating License No. NPF-74
and the Technical Specifications

Date of Issuance: June 14, 2024

ATTACHMENT TO LICENSE AMENDMENT NOS. 222, 222, AND 222 TO

RENEWED FACILITY OPERATING LICENSE NOS. NPF-41, NPF-51, AND NPF-74

PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3

DOCKET NOS. STN 50-528, STN 50-529, AND STN 50-530

Replace the following pages of Renewed Facility Operating Licenses Nos. NPF-41, NPF-51, and NPF-74, and the Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment numbers and contain marginal lines indicating the areas of change.

Renewed Facility Operating License No. NPF-41

REMOVE	INSERT
5	5

Renewed Facility Operating License No. NPF-51

REMOVE	INSERT
6	6

Renewed Facility Operating License No. NPF-74

REMOVE	INSERT
4	4

Technical Specifications

REMOVE	INSERT
3.3.11-1	3.3.11-1
3.3.11-3	---

(1) Maximum Power Level

Arizona Public Service Company (APS) is authorized to operate the facility at reactor core power levels not in excess of 3990 megawatts thermal (100% power), in accordance with the conditions specified herein.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 222, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this renewed operating license. APS shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan, except where otherwise stated in specific license conditions.

(3) Antitrust Conditions

This renewed operating license is subject to the antitrust conditions delineated in Appendix C to this renewed license.

(4) Operating Staff Experience Requirements

Deleted

(5) Post-Fuel-Loading Initial Test Program (Section 14, SER and SSER 2)*

Deleted

(6) Environmental Qualification

Deleted

(7) Fire Protection Program

APS shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility, as supplemented and amended, and as approved in the SER through Supplement 11, subject to the following provision:

APS may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

* The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

(1) Maximum Power Level

Arizona Public Service Company (APS) is authorized to operate the facility at reactor core power levels not in excess of 3990 megawatts thermal (100% power) in accordance with the conditions specified herein.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 222, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this renewed operating license. APS shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan, except where otherwise stated in specific license conditions.

(3) Antitrust Conditions

This renewed operating license is subject to the antitrust conditions delineated in Appendix C to this renewed operating license.

(4) Operating Staff Experience Requirements (Section 13.1.2, SSER 9)*

Deleted

(5) Initial Test Program (Section 14, SER and SSER 2)

Deleted

(6) Fire Protection Program

APS shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility, as supplemented and amended, and as approved in the SER through Supplement 11, subject to the following provision:

APS may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

(7) Inservice Inspection Program (Sections 5.2.4 and 6.6, SER and SSER 9)

Deleted

* The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

(4) Pursuant to the Act and 10 CFR Part 30, 40, and 70, APS to receive, possess, and use in amounts required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and

(5) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, APS to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

Arizona Public Service Company (APS) is authorized to operate the facility at reactor core power levels not in excess of 3990 megawatts thermal (100% power), in accordance with the conditions specified herein.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 222, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this renewed operating license. APS shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan, except where otherwise stated in specific license conditions.

(3) Antitrust Conditions

This renewed operating license is subject to the antitrust conditions delineated in Appendix C to this renewed operating license.

(4) Initial Test Program (Section 14, SER and SSER 2)

Deleted

(5) Additional Conditions

The Additional Conditions contained in Appendix D, as revised through Amendment No. 212, are hereby incorporated into this renewed operating license. The licensee shall operate the facility in accordance with the Additional Conditions.

3.3 INSTRUMENTATION

3.3.11 Remote Shutdown System

LCO 3.3.11 The Remote Shutdown System Instrumentation Functions and each Remote Shutdown System disconnect switch and control circuit shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

----------NOTE----------
Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required Functions inoperable.	A.1 Restore required Functions to OPERABLE status.	30 days
B. One or more remote shutdown system disconnect switches or control circuits inoperable.	B.1 Restore required switch(s)/circuit(s) to OPERABLE status OR B.2 Issue procedure changes that identify alternate disconnect methods or control circuits	30 days 30 days
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3. AND C.2 Be in MODE 4.	6 hours 12 hours

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 222, 222, AND 222 TO RENEWED FACILITY

OPERATING LICENSE NOS. NPF-41, NPF-51, AND NPF-74

ARIZONA PUBLIC SERVICE COMPANY, ET AL.

PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3

DOCKET NOS. STN 50-528, STN 50-529, AND STN 50-530

1.0 INTRODUCTION

By letter dated May 12, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23132A339), Arizona Public Service Company (the licensee) submitted a license amendment request (LAR) for amendments to Renewed Facility Operating License Nos. NPF-41, NPF-51, and NPF-74 for Palo Verde Nuclear Generating Station (Palo Verde), Units 1, 2, and 3, respectively. The amendments would revise the Technical Specifications (TSs) to adopt Technical Specification Task Force (TSTF) Traveler TSTF-266-A, Revision 3, “Eliminate the Remote Shutdown System Table of Instrumentation and Controls” (ML040620072). Specifically, the licensee proposed to delete TS table 3.3.11-1, “Remote Shutdown System Instrumentation and Controls,” from Palo Verde, Units 1, 2, and 3 TS 3.3.11, “Remote Shutdown System.” The licensee would place the content of TS table 3.3.11-1 into licensee-controlled documents.

2.0 REGULATORY EVALUATION

2.1 System Description

As described in the LAR and TS 3.3.11 Bases for Palo Verde, Units 1, 2, and 3, the Remote Shutdown System (RSS) provides the control room operator with sufficient instrumentation and controls to place and maintain the unit in a safe shutdown condition from a location other than the control room. This capability is necessary to protect against the possibility that the control room becomes inaccessible. A safe shutdown condition is defined as Mode 3. With the unit in Mode 3, the Auxiliary Feedwater (AFW) System and the steam generator (SG) safety valves or the SG atmospheric dump valves can be used to remove core decay heat and meet all safety requirements. The long-term supply of water for the AFW System and the ability to borate the Reactor Coolant System from outside the control room allows extended operation in Mode 3.

If the control room becomes inaccessible, the operators can establish control at the remote shutdown panel, and place and maintain the unit in Mode 3. Not all controls and necessary transfer switches are located at the remote shutdown panel. Some controls and transfer switches would have to be operated locally at the switchgear, motor control panels, or other local stations. The unit automatically reaches Mode 3 following a unit shutdown and can be maintained safely in Mode 3 for an extended period.

2.2 Proposed Changes

In the LAR, the licensee proposed the following changes for Palo Verde, Units 1, 2,and 3 TSs based on TSTF-266-A.

Limiting condition for operation (LCO) 3.3.11 currently states:

> The Remote Shutdown System Instrumentation Functions in Table 3.3.11-1 and each Remote Shutdown System disconnect switch and control circuit shall be OPERABLE.

TS 3.3.11, condition A, currently states: “One or more required Functions in Table 3.3.11.1 inoperable.”

TS table 3.3.11-1 currently lists functions and instruments with their required number of channels for the following categories:

1. Reactivity Control
2. Reactor Coolant System Pressure Control
3. Decay Heat Removal (via Steam Generators)
4. Decay Heat Removal (via Shutdown Cooling System), and
5. Reactor Coolant System Inventory Control.

The proposed change would delete TS table 3.3.11-1 from the TSs and modify LCO 3.3.11 and Condition A to remove references to the table. Upon the deletion of TS table 3.3.11-1, the licensee would place the content of this table into the TS 3.3.11 Bases, a licensee-controlled document.

2.3 Proposed Changes to Technical Specifications Bases

In accordance with Title 10 of the *Code of Federal Regulations* 50.36(a)(1), the licensee submitted corresponding changes (moving the RSS Instrumention Functions table content) to the TS Bases that provide the reasons for the proposed TS changes. The regulation at 10 CFR 50.36(a)(1) states, in part, that “[a] summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application, but shall not become part of the technical specifications.” The licensee shall make changes to Palo Verde, Units 1, 2, and 3 TS Bases in accordance with TS 5.5.14, “Technical Specifications (TS) Bases Control Program.”

2.4 Applicable Regulatory Requirements

The NRC staff identified the following regulatory requirements and guidance as applicable to the proposed amendments:

Per 10 CFR 50.36(c)(2), TSs will include items in, among other categories, LCOs. As described in 10 CFR 50.36(c)(2)(i), LCOs "are the lowest functional capability or performance levels of equipment required for safe operation of the facility."

The regulation in 10 CFR 50.36(c)(2)(ii) contains the criteria for which a technical specification limiting condition for operation of a nuclear reactor must be established. TS inclusion is required for each item meeting one or more of the following criteria:

(A) Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

(B) Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

(C) Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

(D) Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

Appendix A to 10 CFR Part 50, "General Design Criteria for Nuclear Power Plants," lists the general design criteria (GDCs), which establish the necessary design, fabrication, construction, testing, and performance requirements for structures, systems, and components important to safety.

Specifically, GDC 19, "Control room," requires, in part, that,

> Equipment at appropriate locations outside the control room shall be provided
>
> (1) with a design capability for prompt hot shutdown of the reactor, including necessary instrumentation and controls to maintain the unit in a safe condition during hot shutdown, and
>
> (2) with a potential capability for subsequent cold shutdown of the reactor through the use of suitable procedures.

2.5 Guidance

The NRC-approved Traveler TSTF-266-A, Revision 3 ("the Traveler"), removed the list of RSS functions from the standard TS (STSs). Though the Traveler was developed based on changes to Revision 1 of NUREG-1432, the NRC staff's review of this LAR includes consideration of

whether the proposed changes are consistent with the latest revision (i.e., NUREG-1432, Revision 5, "Standard Technical Specifications Combustion Engineering Plants," Volume 1, "Specifications" (ML21258A421), which provides example TS LCOs and acceptable remedial actions that meet the requirements in 10 CFR 50.36(c)(2) for a standard plant design.

3.0 TECHNICAL EVALUATION

3.1 Evaluation of Proposed Technical Specification Changes

The licensee proposed to change TS 3.3.11 LCO to state that "[t]he Remote Shutdown System Instrumentation Functions and each Remote Shutdown System disconnect switch and control circuit shall be OPERABLE." The revision would delete TS table 3.3.11-1 and references in the LCO and TS 3.3.11, Condition A, to instrumentation shown in the table. The proposed change would relocate these details to the TS licensee-controlled documents.

Palo Verde, Units 1, 2, and 3 Updated Final Safety Analysis Report (UFSAR) section 3.1.15 (ML23181A166), discusses compliance with GDC 19. Regarding remote shutdown capabilities, it states, in part, in UFSAR section 3.1.15 that "[i]n the unlikely event that the control room should become inaccessible, sufficient instrumentation and controls are provided outside the control room to:

- Achieve prompt hot shutdown of the reactor.
- Maintain the unit in a safe condition during hot shutdown.
- Achieve cold shutdown of the reactor through the use of suitable procedures."

Therefore, the NRC staff concludes that the relocation of instrumentation listed in TS table 3.3.11-1 to the TS Bases will continue the licensee's compliance with its statement regarding operations of its remote shutdown functions, as the licensee has not proposed any changes in this regard.

The term "OPERABLE" is defined (as part of the definition of "OPERABLE - OPERABILITY") in Palo Verde Units 1, 2, and 3 TS 1.1, "Definitions," as follows:

> A system, subsystem, train, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s).

This definition requires that all instrumentation and controls necessary for the remote shutdown function be operable for the RSS LCO to be met. The surveillance requirements (SRs) in TS 3.3.11 are not proposed to be modified and would remain. SR 3.3.11.1 requires performance of channel checks for each required instrumentation channel. SR 3.3.11.2 requires verification that each required control circuit and transfer switch can perform its intended function. SR 3.3.11.3 requires calibration of each required instrument channel.

Therefore, the practical effect of the requested amendments, which deletes table 3.3.11-1 from TS 3.3.11 and deletes associated references from the LCO and Condition A, is to provide the licensee discretion to determine which RSS Functions "necessary attendant instrumentation

[and] controls" or otherwise meet the definition of operable as applied to the Remote Shutdown System functions.

The NRC staff concludes that the SRs and the requirements in proposed LCO 3.3.11 are sufficient to ensure that the instruments and control circuits will be operable if unit conditions require that the RSS be placed in operation.

The NRC staff notes that the removal of these details, which are related to system design, from the TS is acceptable because this type of information is not necessary to be included in the TS to provide adequate protection of public health and safety. The NRC staff finds the relocation of the RSS instrumentation and controls table from the TSs to the Bases is acceptable because it will be adequately controlled by NRC requirements in the TS 5.5.14 Bases control program. This approach provides an effective level of regulatory control and provides for a more appropriate change control process.

The four criteria for content required to be included in TSs is described in 10 CFR 50.36(c)(2)(ii). TS 3.3.11 is included because it meets Criterion 4, "[a] structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety." Additionally, TS 3.3.11 Bases states, the RSS is considered an important contributor to the reduction of unit risk to accidents, and thus is retained in the TS.

Moreover, relocation of the subject list of variables to the TS Bases is acceptable because its inclusion in the TS does not fall within the criteria for mandatory inclusion in the TS in 10 CFR 50.36(c)(2)(ii). The NRC staff finds that sufficient regulatory controls exist under the regulations to maintain the effect of the provisions in these Bases.

3.2 Evaluation of Variation from TSTF-266-A

In section 2.3 of the LAR, the licensee identified variations from TSTF-266-A for table 3.3.11-1. A reviewer's Note in the NRC-approved TSTF-266-A states that NUREG-1432 STS table 3.3.12-1 is provided for illustrative purposes only and does not attempt to encompass every Function used at every unit but does contain the types of Functions commonly found. The other variations describe different terminology used in Palo Verde Units 1, 2, and 3 TS 3.3.11, which is specific to these units. These site-specific variations are appropriate and expected; therefore, the staff finds the variations from TSTF-266-A acceptable.

3.3 Technical Conclusion

The NRC staff has reviewed the licensee's proposed changes to the Palo Verde, Units 1, 2, and 3 TS table 3.3.11-1 and references in TS 3.3.11 to it in the LCO and Condition A. Based on the NRC staff's technical evaluation above, the NRC staff concludes that the relocating the content from TS 3.3.11 to the TS Bases is acceptable, and that the information will be adequately controlled by NRC requirements in the Palo Verde TS 5.5.14 Bases control program. Therefore, the NRC staff concludes that the proposed change complies with the regulatory requirements in 10 CFR 50.36(c)(2) and meets the intent of 10 CFR Part 50, Appendix A, GDC 19.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Arizona State official was notified of the proposed issuance of the amendments on May 9, 2024. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of facility components located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, published in the *Federal Register* on June 13, 2023 (88 FR 38549), and there has been no public comment on such finding . Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: K. West, NRR

Date: June 14, 2024

SUBJECT: PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3 – ISSUANCE OF AMENDMENT NOS. 222, 222, AND 222 RE: REVISION TO TECHNICAL SPECIFICATIONS TO ADOPT TSTF-266-A, REVISION 3 (EPID L-2023-LLA-0071) DATED JUNE 14, 2024

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OFFICE	NRR/DORL/LPL4/PM	NRR/DORL/LPL4/LA*	NRR/DSS/STSB*
NAME	WOrders	PBlechman	SMehta
DATE	5/7/2024	5/9/2024	4/5/2024
OFFICE	OGC - NLO	NRR/DORL/LPL/BC*	NRR/DORL/LPL4/PM*
NAME	R. Siegman	JRankin	WOrders
DATE	5/15/2024	6/14/2024	6/14/2024

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