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

June 25, 2026

Mr. 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, UNIT 1 - RELIEF REQUEST 75, ALTERNATIVE FOR IMPLEMENTATION OF EXTENDED REACTOR VESSEL INSERVICE INSPECTION INTERVAL (EPID L-2025-LLR-0087)

Dear Mr. Heflin:

By letter dated September 19, 2025 (Agencywide Documents Access and Management System Accession No. ML25262A158), Arizona Public Service Company (APS, the licensee) requested U.S. Nuclear Regulatory Commission (NRC) approval of Relief Request No. 75 (RR-75) to use an alternative to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, Table IWB-2500-1 for certain pressure-retaining and full penetration welds at Palo Verde Nuclear Generating Station (Palo Verde), Unit 1.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(1), "Acceptable level of quality and safety," the licensee requested approval to perform the ASME Code required volumetric examination of the Unit 1 reactor pressure vessel full penetration pressure-retaining Examination Category B-A and B-D welds once over a 20-year span. Rather than inspecting the subject welds in the fourth and fifth inservice inspection (ISI) intervals as specified by the ASME Code, APS proposes to perform the required examinations once during the fifth ISI interval.

As set forth in the enclosed safety evaluation, the NRC staff has determined that the proposed alternative in the licensee's request provides an acceptable level of quality and safety. Accordingly, the staff concludes that the licensee has adequately addressed the regulatory requirements set forth in 10 CFR 50.55a(z)(1). Therefore, the NRC staff authorizes the use of the proposed alternative in Relief Request No. 75 at Palo Verde, Unit 1 for the fourth and fifth 10-year ISI intervals.

All other ASME Code, Section XI, requirements for which an alternative was not specifically requested and authorized remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

If you have any questions, please contact the Palo Verde project manager, William Orders, at (301) 415-3329 or via email at William.Orders@nrc.gov.

Sincerely,

/RA/

Michael Mahoney, Acting Chief
Operating Reactor Licensing Branch 4
Division Licensing Projects I
Office of Nuclear Reactor Regulation

Docket No. STN 50-528

Enclosure:
Safety Evaluation

cc: Listserv

UNITED STATES
NUCLEAR REGULATORY COMMISSION
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

INSERVICE INSPECTION PROGRAM RELIEF REQUEST 75

REACTOR VESSEL WELD EXAMINATION INTERVAL EXTENSION

PALO VERDE NUCLEAR GENERATING STATION, UNIT 1

ARIZONA PUBLIC SERVICE COMPANY

DOCKET NO. 50-528

1.0 INTRODUCTION

By letter dated September 19, 2025 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25262A158), Arizona Public Service Company (APS, the licensee) requested U.S. Nuclear Regulatory Commission (NRC) approval of Relief Request No. 75 (RR-75) to use an alternative to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, Table IWB-2500-1 for certain pressure-retaining and full penetration welds at Palo Verde Nuclear Generating Station (Palo Verde), Unit 1.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(1), "Acceptable level of quality and safety," the licensee requested approval to perform the ASME Code required volumetric examination of the Unit 1 reactor pressure vessel (RPV) full penetration pressure-retaining Examination Category B-A and B-D welds once over a 20-year span. Rather than inspecting the subject welds in the fourth and fifth inservice inspection (ISI) intervals as specified by the ASME Code, APS proposes to perform the required examinations once during the fifth ISI interval.

2.0 REGULATORY EVALUATION

Regulatory Requirements

Adherence to Section XI of the ASME Code is mandated by 10 CFR 50.55a(g)(4), "Inservice inspection standards requirement for operating plants," which states, in part, that ASME Code Class 1, 2, and 3 components will meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI.

The regulations in 10 CFR 50.55a(z), "Alternatives to codes and standards requirements," states, in part, that alternatives to the requirements of 10 CFR 50.55a(b) through (h) may be used, when authorized by the Director, Office of Nuclear Reactor Regulation, if (1) the proposed

alternatives would provide an acceptable level of quality and safety, or (2) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

The regulation in 10 CFR 50.61, "Fracture toughness requirements for protection against pressurized thermal shock events," requires that the reference temperature of the RPV materials be within specific values to protect RPV materials against pressurized thermal shock (PTS) events.

The regulation in 10 CFR 50.61a, "Alternate fracture toughness requirements for protection against pressurized thermal shock events," specifies alternate rules for protection against PTS events.

Regulatory Guidance

Regulatory Guide (RG) 1.99, Revision 2, "Radiation Embrittlement of Reactor Vessel Materials," May 1988 (ML003740284), specifies guidance on determination of embrittlement shift of RPV materials due to irradiation.

RG 1.174, Revision 1, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," November 2002 (ML023240437), specifies guidance on assessment of risk-informed decisions on changes to the plant-specific current licensing basis.

NUREG-1874, "Recommended Screening Limits for Pressurized Thermal Shock (PTS)," March 2010 (ML15222A848), specifies recommended PTS screening limits for RPV materials.

3.0 TECHNICAL EVALUATION

3.1 Licensee's Proposed Alternative

3.1.1 ASME Code Components Affected

The affected components are the Palo Verde, Unit 1 RPV shell welds and nozzles associated with the following ASME Code, Section XI examination categories and item numbers. These examination categories and item numbers are from subarticle IWB-2500 and Table IWB-2500-1 of the ASME Code, Section XI.

Examination Category	Item No.	Description
B-A	B1.11	Circumferential Shell Welds
B-A	B1.12	Longitudinal Shell Welds
B-A	B1.22	Meridional Head Welds
B-A	B1.30	Shell-to-Flange Weld
B-D	B3.90	Nozzle-to-Vessel Welds
B-D	B3.100	Nozzle Inside Radius Section

Note: Examination Category B-A welds are defined as "Pressure Retaining Welds in Reactor Vessel." Examination Category B-D welds are defined as "Full Penetration Welded Nozzles in Vessels."

3.1.2 Applicable ASME Code Edition and Addenda

The fourth 10-year ISI interval for Palo Verde, Unit 1, is scheduled to end on July 17, 2028. The Code of record for the fourth 10-year ISI interval is ASME Code, Section XI, 2013 Edition. The applicable Code for the fifth 10-year ISI interval will be selected in accordance with the requirements of 10 CFR 50.55a, “Codes and standards.”

3.1.3 Applicable ASME Code Requirement

Paragraph IWB-2411, Inspection Program, requires volumetric examination of essentially 100 percent of RPV pressure-retaining welds identified in Table IWB-2500-1 once each 10-year ISI interval.

3.1.4 Reason for Request

The licensee is requesting an alternative from the IWB-2411 Inspection Program that requires volumetric examination of essentially 100 percent of RPV pressure-retaining Examination Categories B-A and B-D welds once each 10-year ISI interval. The licensee stated that extension of the examination interval for Categories B-A and B-D welds from 10 years to up to 20 years will result in a reduction in radiation exposure and examination costs.

3.1.5 Proposed Alternative and Basis for Use

In section 5, “Proposed Alternative and Basis for Use,” of it submittal, the licensee proposed to not perform the ASME Code required volumetric examination of the Palo Verde, Unit 1, RPV full penetration pressure-retaining Examination Categories B-A and B-D welds for the fourth 10-year ISI interval currently scheduled for fall 2026. Instead, the licensee proposes to perform these volumetric examinations in fall 2035 during the fifth 10-year ISI interval.

The licensee stated that the proposed inspection date is within plus or minus one refueling outage of the latest revised implementation plan, OG-10-238, “Revision to the Revised Plan for Plant Specific Implementation of Extended Inservice Inspection Interval per WCAP-16168-NP, Revision 1, ‘Risk-Informed Extension of the Reactor Vessel In-Service Inspection Interval.’ PA-MSC-0120” (ML11153A033). This implementation plan is used in conjunction with the use of the methodology in WCAP-16168-NP-A, “Risk-Informed Extension of the Reactor Vessel In-Service Inspection Interval,” Revision 3, October 2011 (ML11306A084), hereafter referred to as “WCAP-A” in this safety evaluation (SE). The licensee further stated that this proposed inspection schedule is considered to have a minor impact on the future inspection plan and distribution of inspections over time.

In accordance with 10 CFR 50.55a(z)(1), the licensee proposed an alternate (i.e., extended) ISI interval for the examination of the subject welds on the basis that the current interval can be revised with negligible change in risk by satisfying the risk criteria specified in RG 1.174. The licensee stated that the methodology used to conduct this analysis is based on that defined in WCAP-A. The licensee stated that the results of the calculations for Palo Verde, Unit 1, were compared to those obtained from the Combustion Engineering (CE) pilot plant evaluated in WCAP-A. The licensee stated that the parameters for Palo Verde, Unit 1, are bounded by the results of the CE pilot plant evaluation.

3.1.6 Duration of Proposed Alternative

The licensee stated that the requested alternative is applicable to the Palo Verde, Unit 1, ISI program for the fourth and fifth 10-year ISI intervals.

3.2 NRC Staff Evaluation

The licensee's proposed extended ISI interval in RR-75 is based on a risk-informed RPV fracture mechanics analysis that was performed in accordance with the NRC staff-approved, risk-informed flaw analysis methods in WCAP-A. The methodology in WCAP-A was developed by the Pressurized Water Reactor Owners Group (PWROG) to satisfy through-wall cracking frequency (TWCF) criteria, specifically the 95th percentile total TWCF ($TWCF_{95\text{-}TOTAL}$), for pressurized water reactors (PWRs) established in NUREG-1874 and the delta large early release frequency (ΔLERF) criteria specified in RG 1.174.

In section 3.4 of the NRC staff's SE, dated July 26, 2011 (ML111610242), for WCAP-A (hereafter referred as "WCAP-A SE"), the NRC staff specified plant-specific information that licensees must submit for alternative requests that are based on the methodology of WCAP-A. Tables A-1, A-2, and A-3 in appendix A of WCAP-A show the format used for providing the plant-specific information. The licensee provided the plant-specific information for Palo Verde, Unit 1, in tables 1, 2, and 3 of section 5 of the enclosure to its submittal. The staff evaluated the plant-specific information in the following subsections.

3.2.1 Identification of Limiting Design Basis Transients and Cladding Layers

Regarding the PTS transients, the licensee identified in table 1 of section 5 of the enclosure to its submittal, that the transients are defined in NRC Letter Report, "Generalization of Plant-Specific Pressurized Thermal Shock (PTS) Risk Results to Additional Plants" (ML042880482), hereafter referred as "PTS Generalization Study," and that those transients serve as the limiting design-basis transients for the RPV welds that were assessed in Palo Verde, Unit 1. The NRC staff verified that for CE-designed-PWRs, such as Palo Verde, Unit 1, the PWROG's methodology in WCAP-A uses the PTS transients that were defined in NUREG-1874 and clarified in the PTS Generalization Study as the limiting PTS transients for the PWROG's risk-informed flaw analysis that was included in WCAP-A. Therefore, the NRC staff finds the licensee's transient basis to be acceptable based on the information in NUREG-1874 and the PTS Generalization Study. Also, the NRC staff stated in the WCAP-A SE that the PTS transient characteristics for a given nuclear steam supply system (NSSS) design of U.S. PWR facilities are generically applicable for all PWRs designed by the same reactor nuclear NSSS vendor (i.e., CE for Palo Verde, Unit 1).

Regarding the cladding layers, the licensee reported in table 1 of section 5 of the enclosure to its submittal that the cladding for the RPV at Palo Verde, Unit 1, was deposited as a single layer. The NRC staff confirmed that the RPV cladding at the CE plant analyzed in WCAP-A was deposited using a single layer. Thus, for the proposed alternative, the NRC staff concludes that the licensee did not need to evaluate the impacts that multiple pass layers would have on the design of the RPV cladding because: (1) the cladding layer at Palo Verde, Unit 1, was deposited as a single layer, and (2) the design of the cladding layer at Palo Verde, Unit 1 is consistent with and bounded by the staff's evaluation of the cladding layer in the WCAP-A SE.

3.2.2 Frequency and Severity of Design Basis Transients

In section 3.3, “Implementation and Monitoring,” of the WCAP-A SE, the NRC staff stated, in part, that:

> The number of transient cycles that were utilized in the fatigue crack growth analysis was discussed in Section 3.2.1 of this revised final SE. The PWROG used… 13 heat-up and cool-down cycles per year for CE-designed plants…. Since the PWROG fatigue crack growth analysis of CE NSSS designed plants determined that the amount of crack growth from 13 cool-down transients bounds the expected crack growth from both cool-down and loss of secondary pressure transients, CE plants should monitor the number of cool-down transients.

In table 1 of section 5 of the enclosure to its submittal, the licensee indicated that the plant-specific basis for frequency and severity of design-basis transients is bounded by the 13 cycles/reactor year of plant heatup and cooldown transients of the associated pilot plant assessed in WCAP-A.

The NRC staff confirmed that the PWROG established 13 cycles/reactor year as the maximum bounding number of heatup and cooldowns that could occur for CE-designed PWRs. Based on the discussion above, the NRC staff finds that the plant-specific frequency and severity of design basis transients is bounded by the established 13 cycles/reactor year for CE-designed PWR units in WCAP-A.

3.2.3 Scope and Schedule for Inspecting the RPV Welds During the 20-Year ISI Interval

In section 3.4, “Submit Proposed Change,” of the WCAP-A SE, the NRC staff stated that licensees should identify the ISI schedule for RPV weld examinations that will be performed during the proposed 20-year ISI interval. The WCAP-A SE also established the staff’s position that the dates for the weld inspections must be within one refueling cycle of the revised dates identified for inspection in the implementation plan in PWROG Letter No. OG-10-238 (ML11153A033).

In section 5 and in table 2 of the enclosure to its submittal, the licensee proposes not to perform required ASME Code volumetric examinations of the applicable RPV weld components of Palo Verde, Unit 1, for the fourth 10-year ISI interval currently scheduled for fall 2026. The licensee proposes instead to perform these volumetric examinations during the fifth 10-year ISI interval in fall 2036. The licensee stated that this proposed inspection date is in accordance with the implementation plan in PWROG Letter No. OG-10-238 since the plan reflects the next inspection for Palo Verde, Unit 1 to be performed in 2036. The NRC staff confirmed that the 2036 inspection date is listed as the “Subsequent ISI Date” in PWROG Letter No. OG-10-238.

Based on the discussion above, the NRC staff finds that the licensee’s proposed scope and schedule for inspecting the subject RPV welds are acceptable because it aligns with the staff position in section 3.4 of the WCAP-A SE that inspections fall within one refueling cycle of the revised dates in PWROG Letter No. OG-10-238.

3.2.4 Relevant Operating Experience - Summary of ISI Results

In section 3.4 of the WCAP-A SE, the NRC staff established its position that a licensee submitting risk-informed ISI extension(s) for its RPVs should report the results of its prior ISI inspections of the applicable RPV weld locations.

In table 2 of the enclosure to its submittal, the licensee identified that it performed two 10-year ISIs. The licensee reported that 50 subsurface indications were noted during the most recent 10-year ISI with only one of those originally identified during the first 10-year ISI interval. These subsurface indications are in the intermediate and lower shell longitudinal welds. The licensee stated that the indications are acceptable by evaluation per table IWB-3510-1 of Section XI of the ASME Code. Forty of the indications are not within the inner $1/10^{th}$ or 1 inch of the RPV thickness. The licensee reported that the 10 indications that are within the inner $1/10^{th}$ or 1 inch of the RPV thickness are acceptable per the requirements of the Alternate PTS Rule (10 CFR 50.61a). The NRC staff reviewed the reported number of flaws compared to the scaled plant-specific total weld length (1,293 inches) in the inspection volume and the scaled plant-specific inside surface area (11,762 square-inches) in the inspection volume that are greater than the through wall extent (TWE) minimum and less than the TWE maximum. The staff confirmed that they are bounded by table 2 and table 3 of 10 CFR 50.61a as discussed in 10 CFR 50.61a(e)(1).

Based on the discussion above, the NRC staff finds the licensee's ISI results for the subject RPV welds acceptable because the 40 subsurface indications that were detected outside the inner $1/10^{th}$ or 1 inch of the RPV thickness was acceptable per ASME Code, Section XI, and the 10 subsurface indications within $1/10^{th}$ of 1 inch of the RPV thickness were acceptable per ASME Code, Section XI and within the bounds specified in table 2 and table 3 of 10 CFR 50.61a.

3.2.5 Susceptibility to Underclad Cracking of RPV Forgings

In section 3.4 of the WCAP-A SE, the NRC staff determined that licensees with RPVs containing forgings that are susceptible to underclad cracking and have RT_{MAX-FO} values exceeding 240 degrees Fahrenheit (699.67 degrees Rankine) must submit a plant-specific evaluation because the analyses performed in the WCAP-A are not applicable (i.e., the scope of analyses in WCAP-A do not cover the evaluation of RPV underclad cracks for forgings with high RT_{MAX-FO} values).

In table 3 of the enclosure to its submittal, the licensee lists the region and component description of the pieces, which make up the RPV. Item Nos. 1 through 6 are all plate material and Item Nos. 7 through 13 are fabrication welds. Since the RPV at Palo Verde, Unit 1 is made of plates and welds, and not forgings, the issue of susceptibility to underclad cracking of RPV forgings is not applicable to Palo Verde, Unit 1. Based on the discussion above, the NRC staff finds that no further information was required to be submitted by the licensee to meet this condition of the WCAP-A SE.

3.2.6 Submittal of Information Required by 10 CFR 50.61a(e)

In section 3.4 of the WCAP-A SE, the NRC staff stated, in part, that "[l]icensees seeking second or additional interval extensions shall provide the information and analyses requested in Section (e) of 10 CFR 50.61a [10 CFR 50.61a(e)]." The licensee states in the submittal that RR-75 is the second interval extension for Palo Verde, Unit 1. The licensee has provided the

information requested by 10 CFR 50.61a(e) in table 2 of the enclosure to its submittal and verified the information against ASME Code, Section XI or against table 2 and 3 of 10 CFR 50.61(a) as appropriate. The NRC staff reviewed the information and analyses provided against the applicable sections of 10 CFR 50.61a(e) sections (1) through (3) and tables 2 and 3 and determined that the condition in section 3.4 of the WCAP-A SE is satisfied. The NRC staff also reviewed the information provided in the submittal and determined that none of the conditions of 10 CFR 50.61a(e)(4) are applicable to the Palo Verde, Unit 1 RPV and therefore, the staff determined that the licensee does not need to include the information required by 10 CFR 50.61a(e) sections (4) through (6).

3.2.7 TWCF Evaluation

In section 3.4 of the WCAP-A SE, the NRC staff established its position that the maximum adjusted reference temperatures and 30 foot-pounds Charpy V-notch energy shifts in reference temperature values (i.e., RT_{MAX-X} and ΔT_{30} values), as defined in 10 CFR 50.61a may be calculated using the methods documented in RG 1.99, Revision 2, or in an alternate NRC-approved methodology using these types of parameters. The WCAP-A SE also stated that licensees' submittals should include the material property and fluence information related to these parameters and that appendix A of WCAP-A (table A-3) identifies the information needed to be submitted.

In table 3 of the enclosure to its submittal, the licensee included the material property and neutron fluence data, ΔT_{30} values, and RT_{MAX-XX} values for the RPV base metal and weld components of Palo Verde, Unit 1 at 54 effective full-power years. The licensee stated that material properties are based on the Palo Verde Updated Final Safety Analysis Report (UFSAR) and the fluence inputs are based on WCAP-16835-NP Revision 2, "Palo Verde Nuclear Generating Station Units 1, 2, and 3 Basis for RCS Pressure and Temperature Limits Report," dated September 2015. The NRC verified the RT_{NDT} values via Table 5.2-5 and Table 5.2-9 of the UFSAR Revision 23 and the fluence values via updates to the Palo Verde, Units 1, 2, and 3 - Technical Specification Bases Revision 74 (ML22251A398) and the Palo Verde, Units 1, 2, 3 - Technical Requirements Manual. The NRC also noted that the Copper and Nickel values listed in table 3 of the enclosure to the submittal for the axial and circumferential welds use the updated CE NPSD-1039 values discussed in the NRC SE that approved a similar alternative for Palo Verde, Units 1, 2, and 3 (Relief Request 40 (ML100290415)).

The licensee calculated a $TWCF_{95\text{-}TOTAL}$ value of 6.75×10^{-13} per year for the RPV, as shown in the last line of table 3 of the enclosure to its submittal. This $TWCF_{95\text{-}TOTAL}$ value is less than the limiting $TWCF_{95\text{-}TOTAL}$ value of 3.16×10^{-7} events per year approved in WCAP-A for CE plants. The NRC staff verified the calculations in the "$TWCF_{95\text{-}XX}$" column of table 3 of the enclosure to the submittal and noted that the licensee's $TWCF_{95\text{-}XX}$ values were conservative compared to the $TWCF_{95\text{-}XX}$ values in the NRC staff's calculations. Therefore, the staff finds that the licensee's $TWCF_{95\text{-}TOTAL}$ value for the Palo Verde, Unit 1 RPV is acceptable.

The NRC staff noted that the methodology in WCAP-A conservatively sets the $TWCF_{95\text{-}TOTAL}$ equal to the ΔLERF value for the RPV that may result from initiation of the postulated, limiting PTS event at a plant. Thus, based on the staff's independent calculations and verifications discussed above, the staff determined that the $TWCF_{95\text{-}TOTAL}$ value for the Palo Verde, Unit 1 RPV meets the limit of 1×10^{-7} early release events per reactor year that is established for ΔLERF values in RG 1.174.

3.2.8 Summary

Based on the evaluations in sections 3.2.1 through 3.2.7 of this SE, the NRC staff determined that the licensee has satisfied all plant-specific information items specified in the WCAP-A SE. Therefore, the staff finds that the licensee's proposed risk-informed alternative provides an acceptable level of quality and safety in lieu of complying with the ASME Code, Section XI requirements and inspection items specified and referenced in RR-75.

4.0 ENVIRONMENTAL CONSIDERATION

This action relates to actions under 10 CFR 50.55a. The NRC staff has determined that a categorical exclusion applies and that special circumstances under 10 CFR 51.22, "Categorical exclusions," are not present that would preclude reliance on the categorical exclusion. Accordingly, this action meets the eligibility criteria for categorical exclusion set forth in paragraph 10 CFR 51.22(a)(16). Pursuant to 10 CFR 51.22, no environmental impact statement or environmental assessment need be prepared in connection with the action.

5.0 CONCLUSION

As set forth above, the NRC staff has determined that the proposed alternative in the licensee's request would provide an acceptable level of quality and safety. Accordingly, the staff concludes that the licensee has adequately addressed all the regulatory requirements set forth in 10 CFR 50.55a(z)(1). Therefore, the NRC staff authorizes the use of the proposed alternative in Relief Request No. 75 at Palo Verde, Unit 1 for the fourth and fifth 10-year ISI intervals.

All other ASME Code, Section XI, requirements for which an alternative was not specifically requested and authorized remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

Date: June 25, 2026

SUBJECT: PALO VERDE NUCLEAR GENERATING STATION, UNIT 1 - RELIEF REQUEST 75, ALTERNATIVE FOR IMPLEMENTATION OF EXTENDED REACTOR VESSEL INSERVICE INSPECTION INTERVAL DATED (EPID L-2025-LLR-0087) DATED JUNE 25, 2026

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