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102-04454-AKK/SAB/RMW
June 7, 2000

Received
4:45pm
12 June 2000

Rules and Directives Branch
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, DC 20555

65FR# 24231
25 Apr 00
19

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Comments on Draft Regulatory Guide DG-1095, Guidance for
Implementation of 10 CFR 50.59, 'Changes, Tests and Experiments'**

Arizona Public Service Company (APS) is taking this opportunity to provide comments on the proposed regulatory guidance described in DG-1095 regarding 10 CFR 50.59. APS has performed a detailed review of the proposed guidance and has actively participated in the development of industry comments provided by the Nuclear Energy Institute (NEI). APS endorses the NEI comments and supports the industry initiative to implement the revised industry guidance contained in NEI 96-07, Guidelines for 10 CFR 50.59 Evaluations.

APS appreciates the opportunity to provide comments on the draft regulatory guide and believes thorough evaluations performed in accordance with 10 CFR 50.59 are an important responsibility. The NEI guidance, including the proposed revisions to address the clarifications identified in DG-1095, provides the necessary tool to perform sound 10 CFR 50.59 evaluations. As a result, APS requests that NEI 96-07, Revision 1, as modified in the NEI comment letter regarding DG-1095, be endorsed by DG-1095 without exception.

Please contact Scott A. Bauer at (623) 393-5978 if you have any questions or require additional information.

Sincerely,

AKK/SAB/RMW/kg

cc: E. W. Merschoff
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Template: ADM-013

E-RIDS: ADM-03
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