



Angela K. Krainik
Director
Regulatory Affairs
Palo Verde Nuclear
Generating Station

10 CFR 50.44
10 CFR 50.46

Mail Station 7636
P.O. Box 52034
Phoenix, AZ 85072-2034
Tel: 623/393-5421
Fax: 623/393-5442

9

DOCKET NUMBER

102-04473 - AKK/SAB/JAP

PETITION RULE PRM 50-71

August 8, 2000

(65 FR 34599)

Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemakings and Adjudications Staff

788 AUG 22 2000 P 4:39
ADD
APR 22 2000 P 4:39

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Comments on Petition for Rulemaking to Use Zirconium-Based
Cladding Materials Other Than Zircaloy or ZIRLO**

Arizona Public Service Company (APS) agrees with and supports the Nuclear Energy Institute petition for rulemaking (Docket No. PRM-50-71, dated April 12, 2000) to allow nuclear power plant licensees to use zirconium-based cladding materials other than zircaloy or ZIRLO, provided the cladding materials meet the requirements for fuel cladding performance and have received approval by the Nuclear Regulatory Commission (NRC) staff. (Federal Register: May 31, 2000, Volume 65, Number 105). This proposed rule change would reduce the NRC and licensees' administrative burden without an impact to safety when using NRC-approved alternative cladding material.

No commitments are being made to the NRC by this letter.

If you have any questions, please contact Scott A. Bauer at (623) 393-5421.

Sincerely,

AKK/SAB/JAP/kg

cc: E. W. Merschoff
M. B. Fields
J. H. Moorman
NEI

Template = SECY-067

SECY-02