



Palo Verde Nuclear  
Generating Station

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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-3020, "Guidance for  
Implementation of 10 CFR 72.48, Changes, Tests, and Experiments."**

In the January 3, 2001 Federal Register (66 FR 390), the NRC announced the availability of draft Regulatory Guide DG-3020, "Guidance for Implementation of 10 CFR 72.48, Changes, Tests, and Experiments." This draft Regulatory Guide endorses, with clarifications, the draft Nuclear Energy Institute (NEI) document NEI 96-07, Appendix B, "Guidelines for 10 CFR 72.48 Implementation," dated November 6, 2000.

Arizona Public Service Company (APS) has been participating with NEI, other licensees, dry storage cask vendors, and the NRC in the development of NEI 96-07, Appendix B. In response to the NRC request for comments on draft Regulatory Guide DG-3020, NEI plans to submit comments along with a revised version of NEI 96-07, Appendix B that will incorporate changes to address the draft Regulatory Guide clarifications, as appropriate. APS endorses the comments to be provided by NEI, and supports the issuance of Regulatory Guide DG-3020 to endorse the revised NEI 96-07, Appendix B without separate clarifications.

No commitments are being made to the NRC by this letter. If you have any questions, please contact Scott A. Bauer at (623) 393-5978.

Sincerely,

CKS/SAB/GAM

cc: E. W. Merschoff  
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