



10 CFR 50.59

Palo Verde Nuclear
Generating Station

Gregg R. Overbeck
Senior Vice President
Nuclear

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102-04568-GRO/SAB/RMW
May 10, 2001

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

- References: 1) NRC Regulatory Issue Summary 2001-03 dated January 23, 2001, "Changes, Tests and Experiments", from USNRC to Addressees
- 2) APS letter 102-04531-GRO/SAB/RMW, dated February 20, 2001, "Implementation of Revised 10 CFR 50.59", from G. R. Overbeck, Arizona Public Service Co., to USNRC

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Docket Nos. STN 50-528/529/530
Revised Implementation Date for Implementation of Revised 10 CFR
50.59**

The effective date for the revised 10 CFR 50.59 was established in a December 13, 2000, *Federal Register* notice (65 FR 77773), as March 13, 2001. As discussed in Reference 1, the NRC has stated that to permit an orderly transition to the revised rule, licensees may implement the rule later than this date. Although an exemption is not necessary, Reference 1 suggested that a licensee may want to communicate its implementation plan to the NRC.

In accordance with Reference 1, APS communicated our intent to the NRC in Reference 2 to implement the revised 10 CFR 50.59 rule by June 30, 2001. As stated in Reference 2, PVNGS Unit 1 entered a refueling outage on March 31, 2001. The completion of this refueling outage was delayed due to the unplanned replacement of control element assemblies (CEAs). Therefore, in order to accommodate the CEA replacement activities and the need to provide additional, targeted training to individuals that will be performing 10 CFR 50.59 related activities, PVNGS has revised the implementation date for the revised rule to be on, or before, September 30, 2001. Until that time, PVNGS will continue to apply the requirements of the current rule using our existing 10 CFR 50.59 review processes.

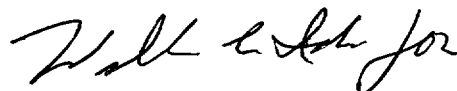
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Revised Implementation Date for Implementation of Revised 10 CFR 50.59
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No commitments are being made to the NRC by this letter.

Should you have any questions, please contact Thomas N. Weber at (623) 393-5764.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Weber", written in a cursive style.

GRO/SAB/RMW/kg

cc: E. W. Merschoff [Region IV Administrator]
L. R. Wharton [NRR Project Manager]
J. H. Moorman [Sr. Resident Inspector]
E. M. McKenna [NRR/RGEB]



FORSGREN
ASSOCIATES INC.

May 9, 2001

US Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

RE: NRC – Reply to Notice of Violation
Reference Docket #030-32248
License #11-27091-01

Sirs:

Forsgren Associates responded to a notice of violation in a document, dated April 24, 2001. In that document, I was named as the Radiation Safety Officer for the firm. While reviewing the document, I noted in the License Amendment that Item 7, Individuals Responsible for Radiation Safety Program and Their Training Experience, should be modified to reflect my training experience. Therefore, this letter is being submitted to reflect my training and experience.

The following are the Radiation Safety Officer's training in radiation safety:

- Service as an officer aboard nuclear weapon capable US Navy ship for 4 years
 - Member of Personnel Reliability Program
 - Member of Nuclear Weapon Security Team
 - Top Secret Clearance
 - Training for operations in nuclear battleground
- NROTC military courses, including nuclear weapons and their effects
- Troxler training for operation of nuclear density gauges
- College physics
- Five years as field engineer for highway construction, responsible for nuclear density gauge operation and reporting procedures
- 8 hour Radiation Safety Officer Course

I hope this information will clarify my qualifications as Radiation Safety Officer for our nuclear license. If you need additional information, have any questions, or if there are any other requirements, please call me at 208-342-3144.

IE07

Sincerely,

FORSGREN ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read "Jim D. Farrens". The signature is fluid and cursive, with a large initial "J" and "F".

Jim D. Farrens, P.E.
Radiation Safety Officer

Cc Christi Hernandez - NRC Region IV Regional Administrator