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Palo Verde Nuclear
Generating Station

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DOCKETED NUMBER

**PROPOSED RULE: PR-1,2,50,51,52,54,60,70,73,76&110
(66 FR 19610)**

~~102-04607-CDM/SAB/RAS-
September 11, 2001~~

102-04608-GRO/SAB/JAP
September 14, 2001

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

**DOCKETED
USNRC**

September 25, 2001 (11:51AM)

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Comments on Proposed Rule for "Changes to
Adjudicatory Process" (ref. Federal
Register: April 16, 2001 - volume 66, number 73,
page 19609)**

**OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF**

Dear Madam Secretary:

Arizona Public Service Company (APS) submits the following comments in support of the NRC's proposed rule advocating changes to the NRC's Rules of Practice on the conduct of hearings in NRC adjudications. In addition to the comments contained in this letter, APS has also reviewed the comments prepared by the Nuclear Energy Institute (NEI) and APS hereby endorses NEI's comments.

APS applauds the NRC for its willingness to adopt changes that will make the adjudicatory process better and more efficient. APS agrees with NEI's assessment that the NRC's proposal to change its Rules of Practice comes at a critical time and if the changes in the proposed rules are adopted it will fill an important gap in the NRC's efforts at regulatory reform. Once again, the NRC should be commended for its efforts in this regard.

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,

GRO/SAB/JAP

cc: E. W. Merschhoff
L. R. Wharton
J. H. Moorman