



James M. Levine
Executive Vice President
Generation

TEL (602)250-2095
FAX (602)250-3002

Mail Station 9046
P.O. Box 53999
Phoenix, AZ 85072-3999

EA-02-026

102-04667-JML/SAB/RAS
March 15, 2002

U.S. Nuclear Regulatory Commission
ATTN: Mr. Samuel J. Collins
Room 5D2, Mail Stop O-5E7
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852

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

- References:
1. Letter from S. J. Collins, USNRC to J. M. Levine, APS, and Order Modifying License dated February 25, 2002
 2. APS letter no. 102-04666-JML/SAB/RAS dated March 15, 2002 from J. M. Levine, APS, to S. J. Collins, USNRC

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Docket Nos. STN 50-528, 50-529, and 50-530
Request for Extension of Time to Submit a Response or
Request a Hearing
EA-02-026**

Via reference 1, the U.S. Nuclear Regulatory Commission (NRC or Commission) issued an Order to Arizona Public Service (APS) that modifies the current operating licenses for PVNGS Units 1, 2, and 3. The Order is immediately effective and requires compliance with specific interim safeguards and security compensatory measures as stated in an attachment to the Order.

Section IV of the February 25, 2002, Order states that, in accordance with 10 CFR 2.202, a Licensee must submit an answer to the Order and may request a hearing on the Order within twenty days of the date of the Order. An extension of time in which to submit an answer or to request a hearing on the Order may also be submitted within 20 days of the date of the Order. In addition, the Order states "[w]here good cause is shown, consideration will be given to extending the time to request a hearing."

*A member of the STARS Alliance (Strategic Teaming and Resource Sharing)
Calloway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek*

Soel
1/0

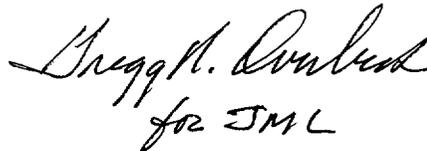
U. S. Nuclear Regulatory Commission
ATTN: Mr. Samuel J. Collins
Request for Extension of Time to Submit a Response or Request a Hearing
Page 2

Because of the unique nature of the situation that precipitated issuance of the Order and the extensive analyses required, we are unable within the twenty-day response time to complete the necessary evaluations to determine what actions are appropriate and what an appropriate schedule for implementation would be for interim compensatory measures (ICMs) B.2.a.(1) and B.2.a.(2). Accordingly, APS respectfully requests the time within which to respond to ICMs B.2.a.(1) and B.2.a.(2) be extended to twenty days after APS completes the necessary evaluations to determine what actions are appropriate and what an appropriate schedule for implementation would be. The evaluations will be completed on or before May 31, 2002. APS also requests that the time to request a hearing on the Order with respect to ICMs B.2.a.(1) and B.2.a.(2) be extended to twenty days after the aforementioned date.

We would appreciate your written concurrence to this request for extension as soon as practical.

If you have any questions concerning this matter, please contact me at 602-250-2095 or Mr. Scott Bauer at 623-393-5978.

Sincerely,



Gregg H. Overland
for JML

JML/SAB/RAS

cc: E. W. Merschoff
D. N. Graves
J. N. Donohew
J. H. Moorman