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ATTN: Document Control Desk  
Director, Spent Fuel Project Office  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS) Unit 1, 2, and 3 and  
Independent Spent Fuel Storage Installation (ISFSI)  
Docket Nos. STN 50-528, 50-529, 50-530 and 72-44  
Affirmation of Need for Dry Cask Certificate of Compliance Amendment**

Arizona Public Service Company (APS) utilizes the NAC-UMS dry cask storage system, Certificate no. 1015, to store spent fuel under a 10 CFR Part 72 general license at the Palo Verde Nuclear Generating Station (PVNGS) Independent Spent Fuel Storage Installation. In a letter dated August 10, 2004, NAC International, Inc., the NAC-UMS certificate holder, submitted a request for an amendment to the NAC-UMS Certificate of Compliance (CoC). In a letter dated December 23, 2004, responding to an NRC request for additional information, NAC International requested that the NRC review support a CoC amendment effective date of June 1, 2005, in order to support APS' summer 2005 dry cask loading campaign.

This letter is to affirm that (1) the changes proposed in the NAC-UMS CoC amendment request will benefit the dry cask loading process at PVNGS, and (2) a CoC amendment effective date no later than June 1, 2005 would allow APS to implement the CoC amendment in the summer 2005 PVNGS dry cask loading campaign.

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,

SAB/TNW/GAM/kg

cc: B. S. Mallett NRC Region IV Regional Administrator  
M. B. Fields NRC NRR Project Manager  
G. G. Warnick NRC Senior Resident Inspector for PVNGS  
J. D. Monninger NRC SFPO (Mail Stop 13 D13)

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