



*A subsidiary of Pinnacle West Capital Corporation*

Palo Verde Nuclear  
Generating Station

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102-05262-GRO/CKS  
May 4, 2005

Mr. Gary Sanborn  
Director of Allegation Coordination and Enforcement Staff  
Region IV, U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Dr., Suite 400  
Arlington, Texas 76011-4005

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. STN 50-528/529/530  
Request for Extension of Time to Respond to Notices of Violation  
EA-04-221 and EA-05-051**

Dear Mr. Sanborn,

This letter is a follow-up to Arizona Public Service Company's (APS') verbal request to extend the time to respond to Notices of Violation EA-04-221 and EA-05-051 issued to APS on April 8, 2005, by an additional 30 days. A request to extend the time to respond to the notices of violation was made during a telephone call on May 3, 2005, between Craig Seaman, Director, Regulatory Affairs, PVNGS, and Gary Sanborn, Director, Allegation Coordination and Enforcement Staff, of Nuclear Regulatory Commission Region IV.

Specifically, this request is to extend the time by 30 days for (1) the Reply to the Notice of Violation (10 CFR 2.201) and (2) any appeal to the Staff's Determination of Significance for the Yellow Finding associated with Notice of Violation EA-04-221. In addition, this request is to extend the time by 30 days for (1) the Reply to the Notice of Violation (10 CFR 2.201), (2) the Statement as to Payment of Civil Penalty, and (3) the Answer to a Notice of Violation (10 CFR 2.205) associated with Notice of Violation EA-05-051.

This request is being made due to complexity associated with the issues involved and the volume of material under review. The 30-day extension would require APS' responses by June 7, 2005.

A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance

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No commitments are being made to the NRC in this letter. Should you have any questions or desire additional information regarding this matter, please call Mr. Seaman at (623) 393-5421.

Sincerely,



GRO/CKS/ca

|     |               |   |
|-----|---------------|---|
| 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 |
|     | F. Congel     | NRC Director, Office of Enforcement     |