



A subsidiary of Pinnacle West Capital Corporation

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102-05365-CKS/TNW/GAM
October 23, 2005

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) Units 1, 2, and 3
Independent Spent Fuel Storage Installation (ISFSI)
Docket Nos. STN 50-528/529/530 and 72-44
10 CFR 72.48(d)(2) Report (up to September 30, 2005)**

Pursuant to 10 CFR 72.48(d)(2), Arizona Public Service Company (APS) is submitting a report of any changes associated with dry cask storage at PVNGS and generated by APS that have been implemented with an evaluation under 10 CFR 72.48(c)(2) up to September 30, 2005. Only one change, implemented in February 2004, has been implemented with an evaluation under 10 CFR 72.48(c)(2).

Description of change:

The calculated exclusion area boundary dose values shown in Figure 4.3-1 of the PVNGS ISFSI 72.212 Evaluation Report were revised to reflect a slight increase (from 1.1E-2 mr/yr to 1.2E-2 mr/yr at year nine of ISFSI operation) due to slightly closer cask spacing than originally assumed as a result of a mechanical interference.

Summary of 10 CFR 72.48(c)(2) evaluation:

The cask spacing at the ISFSI remains greater the minimum specified in the NAC-UMS dry cask Final Safety Analysis Report (FSAR), and all NAC-UMS FSAR safety analyses are unaffected. No changes were made to the design or loading of the dry casks. Compliance with the dose limits in 10 CFR 72.104 and 10 CFR 72.106 is not affected.

There were no NRC commitment changes associated with the PVNGS ISFSI up to September 30, 2005.

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

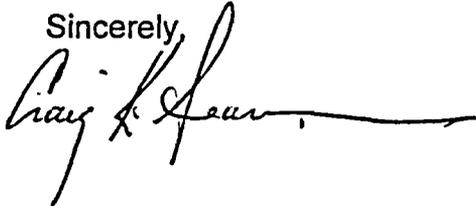
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No commitments are being made to the NRC by this letter. Should you have any questions, please contact Thomas N. Weber at (623) 393-5764.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig K. Hearn", with a long horizontal flourish extending to the right.

CKS/TNW/GAM

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
	R. J. Lewis	NRC SFPO (OWFN, Mail Stop 13 D13)
	F. S. Gee	NRC SFPO (OWFN, Mail Stop 13 D13)