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 AUTH.NAME AUTHOR AFFILIATION  
 VAN BRUNT,E,E. Arizona Public Service Co.  
 RECIPIENT NAME RECIPIENT AFFILIATION  
 KNIGHTON,G,W. Licensing Branch 3

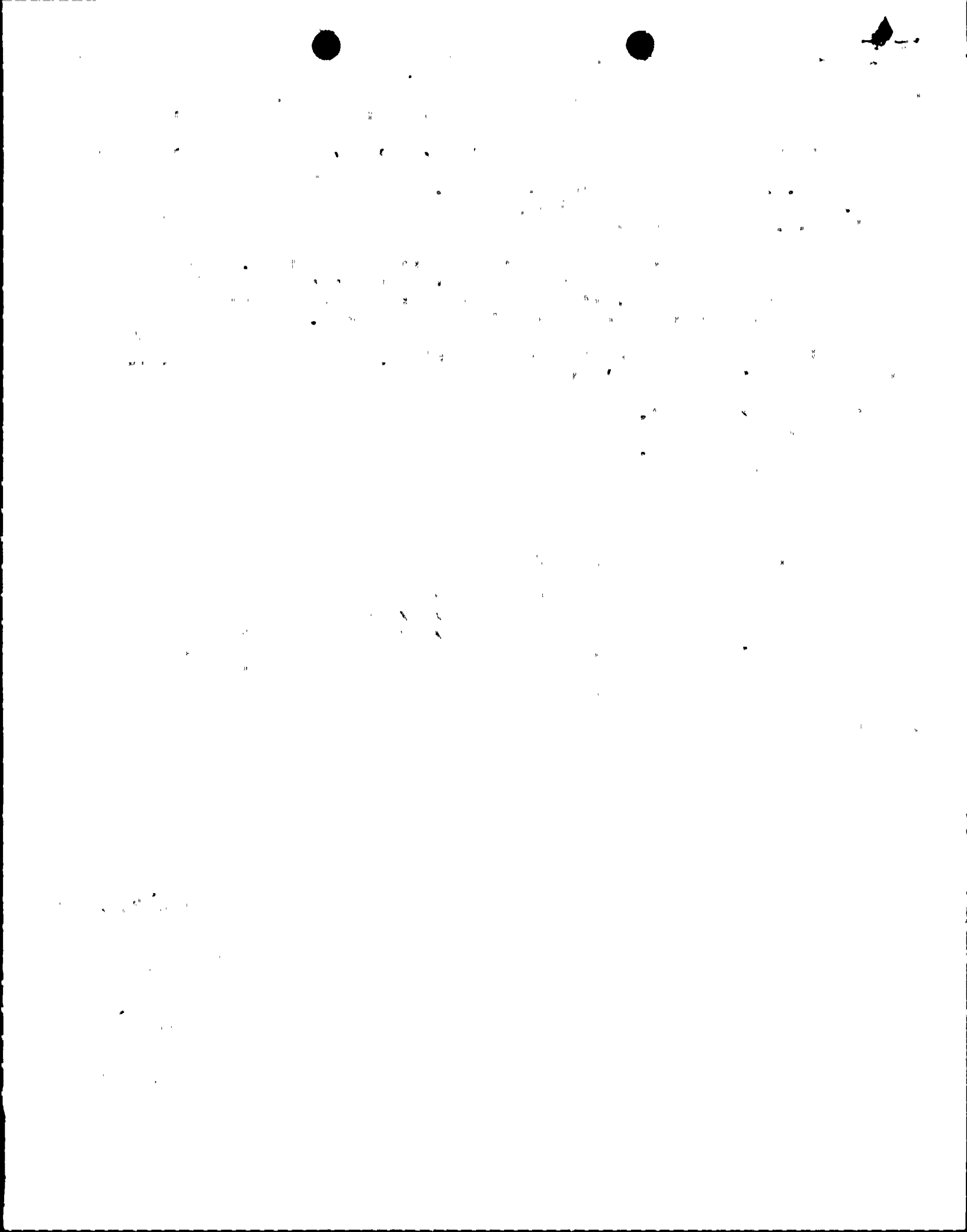
SUBJECT: Requests confirmation of interpretation of 10CFR50.59 re making changes, tests or experiments not described in SAR w/o prior NRC approval if change does not involve unreviewed safety questions or require Tech Spec change.

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## Arizona Nuclear Power Project

P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

ANPP-32126-EEVB/WFQ  
March 12, 1985

Director of Nuclear Reactor Regulation  
Mr. George W. Knighton, Chief  
Licensing Branch No. 3  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Request for Interpretation of 10 CFR 50.59  
Docket Nos. STN 50-528(License No. NPF-34)/529/530  
File: 85-56-026

Dear Mr. Knighton:

Pursuant to 10 CFR 50.59, "Changes, tests and experiments", each holder of an operating license may make changes in the facility and/or procedures as described in the safety analysis report, or conduct tests or experiments not described in the safety analysis report, without prior Commission approval, if the change does not involve an unreviewed safety question (on the basis of a written safety evaluation) or require a technical specification change. In keeping with this philosophy, we believe that if a change is determined not to involve a change to the facility or procedures as described in the safety analysis report, or tests or experiments to be conducted are determined to have been described in the safety analysis report, and a change to technical specifications is not required, a written safety evaluation is not required. Basis for this opinion is contained in I&E Circular No. 80-18, dated August 22, 1980, and the I&E Inspection Manual (specific section for citation not available).

We request confirmation of this philosophy in the way of a formal interpretation pursuant to 10 CFR 50.3. Your response is requested in an expeditious manner.

Please contact Mr. William F. Quinn of my staff if you have any questions on this matter.

Very truly yours,

E. E. Van Brunt, Jr.  
Executive Vice President  
Project Director

EEVB/RMC/mb

cc: E. A. Licitra  
R. P. Zimmerman  
A. C. Gehr

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April  
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