

ARIZONA



PUBLIC SERVICE COMPANY

P. O. BOX 21666 · PHOENIX, ARIZONA 85036

November 30, 1979  
ANPP-14351 - JMA/JPS

*PROPOSED REGULATORY GUIDE*  
*on Core Reloads, Guidance*

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Docketing and Service Branch

Subject: Regulatory Guide comments on  
LWR Core Reloads; Guidance  
on Applications for Amendments  
to Operating Licenses and on  
Refueling and Startup Tests  
File: 79-010-026



*D-1*  
*SC-321-4*

Dear Sirs:

Arizona Public Service Company has reviewed the subject Regulatory Guide. Our comments are attached.

Very truly yours,

*E. E. Van Brunt, Jr.*  
E. E. Van Brunt, Jr.  
APS Vice President,  
Nuclear Projects  
ANPP Project Director

EEVBJr/JPS/av  
Attachment

*1756 352*

Acknowledged by card... *12/28/79*

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Comments

Page 10, Section 2.3.3:

The requirements of the section should be modified to permit the use of expected burnup parameters for the subject reload core, as burnup history applicable to a particular core may be limited or non-existent. This modification will also allow more timely completion of any necessary analyses required for the reload application.

Page 16, Section 4.1:

The requirements of this section concerning photographic verification are overly restrictive. Sufficient assurance can be provided through verification of assembly placements depicted on a hard copy core loading map.

Page 17, Section 4.3, Subsections a. and b.:

Descriptions of these programs should be required only if they (1) deviate from the approved programs described in the FSAR or (2) are directly related to either technical specification changes or an unresolved safety question.

Page 17, Section 4.3, Subsection c.:

A post irradiation surveillance program of spent fuel should be initiated only upon definitive indication of fuel failure in excess of normally expected levels.

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