

OS EM 915-L

ARIZONA



PUBLIC SERVICE COMPANY

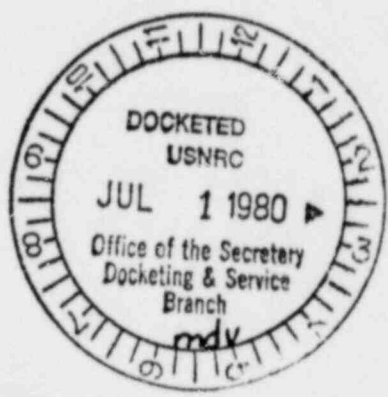
P. O. BOX 21666 • PHOENIX, ARIZONA 85036
June 30, 1980
ANPP-15748 - JMA/JPS

DOCKET NUMBER
PROPOSED RULE **PR-50** (28)
(45 FR 36082)

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

Attention: Docketing and Service Branch

Re: Fire Protection Program for Nuclear
Power Plants Operating Prior to
January 1, 1979 (45 FR 36082)



Dear Sir:

Arizona Public Service Company has reviewed the subject document and would like to register an objection to the requirements of Subpart "P" to proposed Appendix "R" to 10 CFR, Part 50.

Specifically, we see no reasonable basis for requiring either reactor coolant pump (RCP) fire suppression systems or the RCP lube oil components to be able to withstand a safe shutdown earthquake (SSE). In the design of the Palo Verde Nuclear Generating Station, these components are designated Seismic Class IX; this classification indicates these components and associated supporting structures are designed to retain structural integrity during and after an SSE, but do not have to retain operability. Since the RCP's are not required for safe shutdown, we submit that Seismic Class IX automatic and manual fire suppression systems and a Seismic Class IX RCP lube oil system are sufficient to provide adequate protection against postulated RCP lube oil fires.

We appreciate the opportunity to comment on this proposed rule.

Very truly yours,
E. E. Van Brunt
E. E. Van Brunt, Jr.
APS Vice President,
Nuclear Projects
ANPP Project Director

EEVBJr/JPS/av
cc: Janis Kerrigan

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Acknowledged by card... 7/1/80... mdv...
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