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(58FR53159)

(21)

Arizona Public Service Company

PALO VERDE NUCLEAR GENERATING STATION
P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034 94 JAN -4 1994

102-02766-JML-RAB-SAB

December 27, 1993

JAMES M. LEVINE
VICE PRESIDENT
NUCLEAR PRODUCTION

Secretary of the Commission
U. S. Nuclear Regulatory Commission
ATTN: Docketing and Service Branch
Washington, DC 20555

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Comments on Petition for Rulemaking
File: 93-001-503

On October 14, 1993, the Nuclear Regulatory Commission (NRC) published in the Federal Register a notice of receipt of a petition for rulemaking regarding procurement of commercial grade items. Arizona Public Service Company (APS) has reviewed this petition and fully supports it because, as the petitioner states, we have found that the current procurement environment has changed significantly from what it was just a few years ago and the regulation no longer fits the current situation.

Over time, the number of suppliers with programs qualified to the requirements of 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants, has diminished making it increasingly more difficult to obtain pre-qualified replacement parts. More and more, APS has had to revert to purchasing items commercial grade and dedicating the parts for use in the plant. As this trend continues, the current definition of commercial grade presents a more significant obstacle to obtaining the appropriate parts. In view of this trend, a change to the existing regulations is warranted.

The net effect of the proposed rule change is to shift more responsibility for ensuring the quality of parts on the licensee and less on the supplier. As long as reasonable assurance is provided that the commercial grade item will perform its intended function, whether that be done by the supplier or the licensee, there will be no adverse impact on plant safety. As such, APS fully endorses the petition for rulemaking.

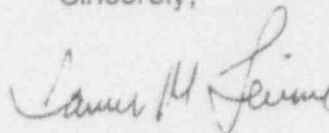
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Should you have any questions, please contact Richard A. Bernier, Nuclear Regulatory
Affairs Supervisor at (602) 393-5882.

Sincerely,

A handwritten signature in cursive script, appearing to read "Samuel H. Levine".

JML/RAB/SAB/rv

cc: W. F. Conway
B. E. Holian
R. W. Bishop (NUMARC)