

Gentlemen:

As required by 10CFR, Part 70.34, attached are six copies of a request for an amendment to the application(s) for a Special Nuclear Material License for the Palo Verde Nuclear Generating Station Unit 1 (PVNGS).

On page 22, section 1.2.3.3, of the Arizona Public Service Company (APS) application dated August 17, 1981, we state that "The Operations Superint" ident is responsible for the development of detailed procedures for new fuel handling."

We request the amendment to read "The Operations Superintendent or his alternate is responsible for the development of detailed procedures for new fuel handling." The alternate, as a minimum, will meet the same requirements as is required for the Operations Superintendent. These requirements are; he will have eight years of responsible power plant experience of which a minimum of three years shall be nuclear power plant experience. (PVNGS FSAR sect. 13.1.3.1, page 13.1-28).

Also, item number 6, page 25, section 2.1.1 of the APS submittal of additional information dated February 16, 1982, states that the Radiation Protection Supervisor is responsible for all aspects of radiation safety at PVNGS and is responsible to see that receiving, handling, and storage is in accordance with approved and documented procedures.







Director of Nuclear Material Safety and Safeguards December 20, 1982 NOS-82-1197

We request that the amendment read, "the Radiation Protection Supervisor or his alternate is responsible" The alternate, as a minimum, will meet the same requirements as required for the Radiation Protection Supervisor. These requirements are; he shall have a minimum of five years experience in radiation protection at a nuclear facility. A minimum of two years of the five years should be related to technical training. A maximum of four of the five years may be fulfilled by related technical or academic training. Two of the five years shall be at a professional level.

Should you have any questions or require additional information, please contact Mr. Steven R. Frost at (602) 271-3348.

Very truly yours,

Mogrupe

G. C. Andognini, Vice President Electric Operations

GCA/JRP/pmk

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cc: Director, Region V, USNRC NRC Resident Inspector - PVNGS NRC Project Manager - M. Licitra