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(57FR 14514)

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Arizona Public Service Company

P.O. BOX 53999 • PHOENIX, ARIZONA 85072-3999

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-02220-WFC/JNI
July 29, 1992

NUCLEAR
CANCELED

Mr. Samuel J. Chilk
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Chilk:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Comments on the Proposed Amendment to 10 CFR 50.63, "Loss of all
Alternating Current Power," 57 Fed. Reg. 14514, April 21, 1992
File: 92-056-026**

Arizona Public Service Company has reviewed the proposed revision to 10 CFR 50.63 and the comments submitted to the NRC by the Nuclear Management and Resources Council (NUMARC). We fully endorse the position taken by NUMARC that the rule change is unnecessary for the following reasons:

- It does not result in an increase in safety; indeed it may decrease safety by the accelerated testing required of the Emergency Diesel Generators,
- The intended goal of Generic Safety Issue B-56 is being met,
- The requirements are essentially redundant to the Maintenance Rule, 10 CFR 50.65,
- Additional enforcement authority is unnecessary.

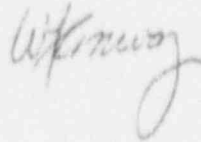
We therefore urge the Commission to abandon promulgation of this proposed amendment.

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Mr. Samuel J. Chilk
Secretary of the Commission
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If you have any questions, please call Thomas R. Bradish of my staff at (602) 393-5421.

Sincerely,



WFC/JNI/jni

Enclosures

cc: J. B. Martin
D. H. Coe
C. F. Tedford
W. R. Rasin (NUMARC)