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U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-37  
Washington, DC 20555-0001

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. STN 50-528/529/530  
Request for Common Operating License Amendment Numbers**

By letter dated May 20, 1998, the NRC issued Amendment No. 117 to Facility Operating License Nos. NPF-41, NPF-51, and NPF-74 for PVNGS Units 1, 2, and 3, respectively. These amendments, which converted the PVNGS technical specifications to the Improved Technical Specifications, were issued as a single document applicable to all three units with a common amendment number for all three units. Consistent with the issuance of Amendment No. 117, APS requests that all future common operating license amendments issued to the PVNGS units be issued with the same amendment number for all three units. This may require skipping amendment numbers for one or two of the units (as was done when Amendment No. 117 was issued) if previously issued amendment(s) applied to only one or two of the units.

No commitments are being made to the NRC by this letter.

Should you have any questions, please contact Scott A. Bauer at (623) 393-5978.

Sincerely,

AKK/SAB/GAM/kg

cc: E. W. Merschoff (NRC Region IV)  
M. B. Fields (NRR Project Manager)  
J. H. Moorman (NRC Resident Inspector)

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