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 FACIL:STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528
 STN-50-529 Palo Verde nuclear Station, Unit 2, Arizona Publi 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530
 AUTH.NAME AUTHOR AFFILIATION
 VAN BRUNT,E.E. Arizona Public Service Co.
 RECIP.NAME RECIPIENT AFFILIATION
 NOVAK,T.M. Assistant Director for Licensing

SUBJECT: Forwards comments on draft environ protection plan.NRC
 should accept other,federal agency findings w/o further
 review.

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NOTES:Standardized plant. 05000528
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1. The purpose of this document is to provide a comprehensive overview of the current status of the project and to identify the key areas for improvement. The document is intended for use by all project team members and is to be kept confidential.

2. The project has been initiated in order to address the need for a more efficient and effective system. The project team has been formed and the initial planning phase is complete. The project is currently in the implementation phase and is expected to be completed by the end of the year.

3. The project team has identified several key areas for improvement, including the need for a more efficient and effective system, the need for a more comprehensive and up-to-date database, and the need for a more robust and secure system. The project team has developed a plan of action to address these areas and is currently implementing the plan.

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Project Status		Project Budget		Project Timeline	
Project Name	Project Manager	Project Budget	Project Manager	Project Timeline	Project Manager
Project A	John Doe	\$100,000	John Doe	12 months	John Doe
Project B	Jane Smith	\$200,000	Jane Smith	18 months	Jane Smith
Project C	Mike Johnson	\$150,000	Mike Johnson	15 months	Mike Johnson
Project D	Sarah Brown	\$120,000	Sarah Brown	10 months	Sarah Brown
Project E	David White	\$80,000	David White	8 months	David White
Project F	Lisa Black	\$90,000	Lisa Black	9 months	Lisa Black
Project G	Robert Green	\$110,000	Robert Green	11 months	Robert Green
Project H	Emily White	\$130,000	Emily White	13 months	Emily White
Project I	Michael Brown	\$140,000	Michael Brown	14 months	Michael Brown
Project J	Anna White	\$160,000	Anna White	16 months	Anna White

Arizona Public Service Company

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PDR ADOCK 05000528
A PDR

December 2, 1982
ANPP-22439 - WFQ/TFQ

Mr. T. M. Novak
Assistant Director for Licensing
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Palo Verde Nuclear Generating Station
(PVNGS) Units 1, 2 and 3
Docket Nos. STN-50-528/529/530
File: 82-056-026; G.1.01.10

Reference: Letter from J. D. Kerrigan, NRC, to E. E. Van Brunt, APS,
dated September 23, 1982. Subject: Environmental Protec-
tion Plan - Palo Verde Nuclear Generating Station

Dear Mr. Novak:

The Referenced letter transmitted a draft version of the Palo Verde
Environmental Protection Plan (EPP), and requested that we provide
comments on this draft document.

We have reviewed the document, and our comments are attached.
Please contact me if you need any further assistance on this matter.

Very truly yours,



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

EEVBJr/TFQ/sp
Attachment

cc: E. Licitra
L. Bernabei
P. Hourihan
A. Gehr

COO2

December 2, 1982

ANPP-22439 - WFQ/TFQ

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President Nuclear Projects of Arizona Public Service Company, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority so to do, that I have read such document and know its contents, and that to the best of my knowledge and belief; the statements made therein are true.

Edwin E. Van Brunt, Jr.
Edwin E. Van Brunt, Jr.

Sworn to before me this 2nd day of December, 1982.

David L. Graham
Notary Public

My Commission expires:

My Commission Expires May 19, 1986

My Commission Expires May 1st 1986

COMMENTS ON 'APPENDIX B TO
LICENSE DPR-50/528/529/530 PVNGS
ENVIRONMENTAL PROTECTION PLAN

Section 2.2--Terrestrial Issues

Although no terrestrial issues requiring environmental monitoring programs were identified in the FES-OL, the applicant feels that it is appropriate to continue the ecological monitoring program referenced in the FES-CP. Further, the applicant intends that this program be augmented to determine what, if any, effects are caused by operation of the cooling towers.

The monitoring program will be conducted on-site and off-site out to approximately 5 miles from the cooling towers. This 5-mile distance corresponds to the maximum distance beyond which it is generally accepted that total salt deposition is not expected to be significant. It will consist of airborne salt monitoring using existing continuous low-volume samplers which are a part of the PVNGS environmental radioactivity monitoring program. Filters from these samplers will be analyzed periodically in a laboratory to determine airborne salt deposition. Further, additional monitoring will be conducted at specific locations which include natural desert and agricultural lands within 5 miles of the PVNGS cooling towers and in areas where maximum total salt deposition values are predicted to occur.. Vegetation and soil monitoring will be conducted seasonally. This program as described above will be instituted for pre-operational baseline monitoring to determine background airborne salt deposition and salt deposition on vegetation and soils. This program will be continued for two years after commercial operation of PVNGS Unit 3.

Section 2.3--Cultural Resources Issues

It is suggested that the responsibility for cultural resource compliance be delegated to the Bureau of Land Management (BLM) instead of the NRC. For the Palo Verde-Devers transmission line construction, the NRC and Department of Interior (DOI) had a Memorandum of Agreement which designated BLM as the lead agency for the powerline. The BLM requirements for construction and monitoring were considered to be adequate to demonstrate compliance with State and Federal archaeological requirements.

In Arizona it is virtually impossible to establish a right-of-way for electric transmission lines without crossing lines owned by the United States Government and managed by the Bureau of Land Management (BLM) or some other agency of the U. S. Department of the Interior or U. S. Department of Agriculture.. Accordingly, before a corridor for electric transmission lines can be identified such agency is obligated to comply with the federal laws designed to protect cultural resources in the same manner as the NRC is obligated so to do. For this reason, it is suggested with respect to the proposed Palo Verde - Saguaro transmission line that if in the selection of the corridor for such line, compliance with federal laws protecting cultural resources has been established by another federal agency, the NRC should accept the findings and conclusions of such agency without further review.

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