

PRIORITY 1

ACCELERATED RIDS PROCESSING

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9505220293 DOC. DATE: 95/05/09 NOTARIZED: NO DOCKET #
 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
 LEVINE, J.M. Arizona Public Service Co. (formerly Arizona Nuclear Power
 RECIP. NAME RECIPIENT AFFILIATION
 RUSSELL, W.T. Office of Nuclear Reactor Regulation (Post 941001)

SUBJECT: Provides support to industry position w/respect to proposed
 rev 10CFR50 App J, "Containment Leakage Testing" as put
 forth by Nuclear Energy Inst.

DISTRIBUTION CODE: A017D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: OR Submittal: Append J Containment Leak Rate Testing

NOTES: STANDARDIZED PLANT 05000528
 Standardized plant. 05000529
 Standardized plant. 05000530

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD4-2 LA	1	PD4-2 PD	1
HOLIAN, B	1	TRAN, L	1
THOMAS, C	1		
INTERNAL: ACRS	6	FILE-CENTER-01	1
NRR/DE/ECGB	1	NRR/DSSA/SCSB	1
OGC/HDS2	1	RES/DE/SEB	1
RES/DSIR/SAIB	1		
EXTERNAL: NOAC	1	NRC PDR	1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL
 DESK, ROOM P1-37 (EXT. 504-2083) TO ELIMINATE YOUR NAME FROM
 DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 19 ENCL 0

P
R
I
O
R
I
T
Y

1

D
O
C
U
M
E
N
T

MA

Arizona Public Service Company

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

035-00370-JML

May 9, 1995

JAMES M. LEVINE
VICE PRESIDENT
NUCLEAR PRODUCTION

U.S. Nuclear Regulatory Commission
ATTN: Mr. William T. Russell
Director, Office of Nuclear Reactor Regulation
Washington, DC 20555-0001

Dear Mr. Russell:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Industry Comments on Proposed Revision to 10CFR50, Appendix J,
"Containment Leakage Testing," to Adopt Performance-Oriented and
Risk-Based Approaches
REF: Letter dated May 8, 1995, from Mr. Thomas E. Tipton, NEI
to Mr. John C. Hoyle, Secretary USNRC

The referenced letter from the Nuclear Energy Institute (NEI) to the NRC discusses the industry's position with respect to the proposed revision of 10CFR50 Appendix J, "Containment Leakage Testing."

The Commission and the NRC staff have expressed support for expeditiously proceeding with promulgation of the Option B rule. APS strongly agrees. APS is very much in favor of the new revision of 10CFR50, Appendix J and firmly supports the comments made by NEI to the NRC. Specifically, we agree with the industry position of the three major concerns explained in Mr. Tipton's letter:

Licensee Commitment in the Plant Technical Specification
Visual Examination of the Containment
Mandatory Licensee Compliance with the Option B

APS has made official comment on the proposed rule under separate cover. The intent of this letter is to give support to the industry position as put forth by NEI.

170039

9505220293 950509
PDR ADDCK 05000528
P PDR

4017
1/0

21

THE FOLLOWING IS A LIST OF THE NAMES OF THE
PERSONS WHOSE NAMES ARE ON THE LIST

U.S. Nuclear Regulatory Commission

ATTN: Mr. William T. Russell

ID: 035-00370-JML

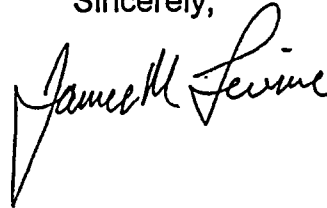
May 9, 1995

Page 2 of 2

In summary, APS is very supportive of the work performed to date by the NRC staff on the proposed revision. We believe the industry comments as related by NEI have merit and strongly request that the staff give them due consideration.

We appreciate the opportunity to give comment and support of this important rule making.

Sincerely,

A handwritten signature in cursive script, appearing to read "James M. Levine".

TCC/JML:hj

cc: Thomas E. Tipton NEI
Thomas C. Cannon

