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AUTH.NAME AUTHOR AFFILIATION
 BRADLEY,M.C. Arizona Public Service Co. (formerly Arizona Nuclear Power
 RECIP.NAME RECIPIENT AFFILIATION
 Records Management Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Investigation Repts
 4-97-022S & 4-1998-014. Corrective actions: all measures taken
 in response to violation, other than those in effect for yr
 or more, complete already.

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Miles C. Bradley
Arizona Public Service Co.
Palo Verde Nuclear Generating Station
5801 S. Wintersburg Rd. Mail Station 7894
Wintersburg, Arizona 85354-7529

August 5, 1998

ID # IA 98-013
Docket No. 55-50476
License No. OP-50323-1

U. S. Nuclear Regulatory Commission
ATTN.: Document Control Desk
Washington, D.C. 20555

Subject: Reply to a Notice of Violation (NRC Investigation Report Nos. 4-97-022S
and 4-1998-014)

To Whom it May Concern:

I am submitting this response in compliance with NRC letter IA 98-013 dated July 10, 1998 and the associated Notice of Violation Re: the investigation reports noted above. I have been requested to respond to four specific aspects of the violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved.

This letter refers to and relies on material already presented to the NRC in my interview with OI and at the March 31, 1998 predecisional enforcement conference in Arlington, Texas.

1 Reasons for The Violation

I do not contest the violation and deeply regret my involvement in it. I believe that adequate further information about it is set forth in the materials referred to above.

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2. Corrective Steps and Results

The corrective actions taken to avoid future instances of deliberate misconduct were outlined in my and APS's presentations at the March 31 Predecisional Enforcement Conference.

3. Steps to Avoid Further Violations

The steps outlined above have had a profound effect on me and will continue to have one for the rest of my working life. Together, they ensure that I will never knowingly be involved in any violation, deliberate or otherwise, ever again. Additionally, as noted in Mr. Merschoff's letter of July 10, 1998, if I ever reapply for Part 55 licensed-operator status, my application will face review under 10 CFR§55.31(b).

4. Full Compliance

All measures taken in response to the violation, other than those in effect for a year or more, are complete already. The remainder will be completed by February 10, 2000. Mr. Merschoff's letter of July 10 indicates that the Commission regards these measures to be sufficient. Thus, I believe that from the Commission's standpoint, and to the extent that this concept can be applied to an individual enforcement action, full compliance has been achieved.

I will be pleased to respond to any further questions you may have.

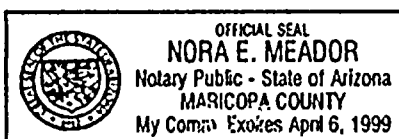
Sincerely yours,


Miles C. Bradley

AFFIRMATION OF MILES C. BRADLEY

County of Maricopa
State of Arizona)

Nora E. Meador
April 6, 1999.

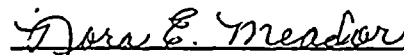




I hereby swear, under penalty of perjury, that the statements I have made in this letter are true and correct.


Miles C. Bradley

Subscribed and sworn to before me this 5 day of August, 1998.


Notary Public
My commission expires: April 6, 1999.

cc: Regional Administrator
U. S. Nuclear Regulatory Commission, Region IV
611 Ryan Plaza Dr. Suite 400
Arlington, Texas 76011-8064

