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SUBJECT: Supplements original request dtd 980609 such that requested exemption to requirements of 10CFR50.71(e) is applicable to listed info. Schedule requirement should be changed from originally requested frequency of 18 months to 24 months.

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102-04229-JML/SAB/RMW

December 21, 1998

U. S. Nuclear Regulatory Commission
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Reference: Letter 102-04131 dated June 9, 1998, from J. M. Levine, APS, to NRC,
"Request for Exemption from 10 CFR 50.71(e)(4), Schedule Requirements
for Submitting Final Safety Analysis Report Updates".

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Supplement to Request for Exemption from 10 CFR 50.71(e)(4),
Schedule Requirements for Submitting Final Safety Analysis Report
Updates

In the referenced letter, Arizona Public Service Company (APS) requested an exemption to 10 CFR 50.71(e)(4) in accordance with 10 CFR 50.12(a) regarding submission of revisions to the Updated Final Safety Report (UFSAR) for PVNGS. APS is hereby supplementing the original request such that the requested exemption to the requirements of 50.71(e) is also applicable to the following:

1. Reporting of changes made to the quality assurance program in accordance with 10 CFR 50.54(a)(3),
2. Reporting of changes, tests and experiments in accordance with 10 CFR 50.59(b)(2), and
3. Reporting of changes made to the Technical Specification Bases in accordance with Section 5.5.14d of the PVNGS Technical Specifications.

In addition, APS requests that the schedule requirement be changed from the originally requested frequency of 18 months from the previous UFSAR update to a 24-month frequency.

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[illegible]

μ is the mean value of the random variable X , σ^2 is the variance of the random variable X , ρ is the correlation coefficient between the two random variables X and Y . The joint probability density function of the bivariate normal distribution can be written as:

[illegible]

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Supplement to Request for Exemption from 10 CFR 50.71(e)(4)
Page 2

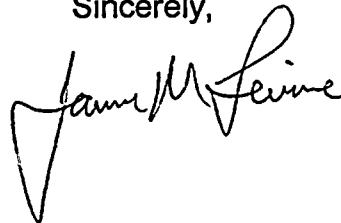
The information provided in the referenced letter as the bases for the original exemption request remains valid and applies to this supplement. In addition, this supplemental request is consistent with recently approved exemption requests to 10 CFR 50.71(e).

Commitments Made in this Letter

This letter does not make any commitments by APS to the NRC.

Please contact Mr. Scott Bauer at (602) 393-5978 if you have any questions or would like additional information regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "James M. Levine". The signature is fluid and cursive, with a large, stylized initial "J" and "L".

JML/SAB/RMW/rjh

cc: E. W. Merschoff
M. B. Fields
J. H. Moorman

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