

FORD 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9210280064 DOC. DATE: 92/10/15 NOTARIZED: NO DOCKET #

FACILITY

AUTH. NAME

LEVINE, J.M.

RECIP. NAME

AUTHOR AFFILIATION

Arizona Public Service Co. (formerly Arizona Nuclear Power

RECIPIENT AFFILIATION

Rules & Directives Review Branch (Post 920323)

SUBJECT: Comment opposing proposed GL "Analog-to-Digital Replacements
Under 10CFR50.59 Rule."

DISTRIBUTION CODE: DS09D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 1
TITLE: SECY/DSB Dist: Public Comment on Proposed Rule (PR)-Misc Notice; Reg

NOTES:

RECIPIENT ID CODE/NAME	COPIES LTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTR ENCL
INTERNAL: OGC/DR 15-B-18	1	OGC/SAIP15-B-18	1
REG-FILE 01	1	RES DIR	1
RES/PMPDAS	1		
EXTERNAL: NRC PDR	02		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK.
ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 6 ENCL

Q

ER

R
I
D
S
/
F
O
R
D
D
O
C
U
M
E
N
T

1. The first part of the report is a general introduction to the subject of the study. It discusses the importance of the study and the objectives of the research. It also mentions the scope of the study and the limitations of the research.

DS09

Alyde Shuaki
57FR 36680
8/14/92
USNRC

(15)

Arizona Public Service Company
P.O. BOX 53999 • PHOENIX, ARIZONA 85072-3999

OFFICE OF ADMINISTRATION

'92 OCT 20 A8:23

WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

254-02208-WFC/SGB
October 15, 1992

U.S. Nuclear Regulatory Commission
Chief, Rules and Directives Review Branch
Washington, DC 20555

References: 1) Federal Register, Volume 57, No. 158, 36680; Notice of Opportunity for Public Comment
2) Letter from William H. Rasin (NUMARC) to Mr. David Meyer (NRC), dated September 14, 1992; Subject: Industry Comments on NRC Draft Generic Letter, "Analog to Digital Replacements Under the 10 CFR 50.59 Rule"

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Comments on Proposed Generic Communication: NRC Generic Letter Analog-to-Digital Replacements Under the 10 CFR 50.59 Rule
File: 92-056-026

Public comments on the NRC proposed Generic Letter, "Analog-to-Digital Replacements Under the 10 CFR 50.59 Rule" were solicited in the referenced Federal Register notice (Reference 1). Arizona Public Service Company (APS) appreciates the opportunity to provide the following comments.

APS disagrees with the NRC Staff position that all digital-based safety system upgrades constitute an unreviewed safety question.

APS supports the recommendations provided by NUMARC (Reference 2). The NRC and NUMARC, as a joint effort, should develop guidance for analog-to-digital upgrades to serve as the framework for licensee implementation and the basis for regulatory oversight.

APS urges the NRC to reconsider its position that all digital-based safety system upgrades constitute an unreviewed safety question.

9210280064 921015
PDR PR
50 57FR36680 PDR

WFC/SGB/skk

cc: W.H. Rasin (NUMARC)

Sincerely,

James M. Levine for WFC

