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PROPOSED RULE **PR 55**
(55 FR 14288)

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USNRC

Arizona Public Service Company

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

161-03307-WFC/GAM
June 29, 1990

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Docket Nos. STN 528/529/530

Mr. Samuel Chilk
Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Services Branch

Dear Mr. Chilk:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 & 3
Proposed Rule - Operators' Licenses
Modification for Fitness-for-Duty
55 Fed. Reg. 14288
Request for Comments
File: 90-056-026

These comments are submitted by Arizona Public Service Company (APS) in response to the request of the U. S. Nuclear Regulatory Commission (NRC) for comments on the proposed rule "Operators' Licenses Modification for Fitness-for-Duty" (55 Fed. Reg. 14288 - April 17, 1990).

APS is fully committed to maintaining a work environment which is free of drugs and alcohol and the effects of these substances. To that end, a rigid fitness-for-duty program which meets or exceeds the requirements of the 10 CFR part 26 Fitness-for-Duty program has been implemented at the Palo Verde Nuclear Generating Station (PVNGS). This program applies to all personnel granted unescorted access to protected areas, including licensed operators, to ensure that PVNGS is operated and maintained by individuals who are able to safely and competently perform their duties. The proposed rule is unnecessary, and singles out licensed operators from other nuclear power plant personnel for no justifiable purpose.

APS is striving to develop an atmosphere of trust that supports professionalism for all personnel in positions that are responsible for safe operations of PVNGS. There is no basis to single out licensed operators to be treated any differently from other plant personnel with unescorted access; to do so may undermine the trust and professionalism we are striving to develop.

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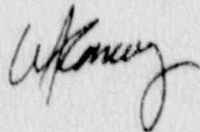
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APS endorses the comments which are being submitted by the Nuclear Management and Resources Council (NUMARC) in response to this proposed rule. The current regulations provide the basis for enforcement actions against licensed operators and for fitness-for-duty requirements for all employees with unescorted access to PVNGS. Therefore, this proposed rule is unnecessary. Further, it may adversely affect the morale of licensed operators, which is a matter of great importance to APS and to the Commission.

APS appreciates the opportunity to comment on the proposed rule. If there are any questions or comments regarding this submittal, please contact R. A. Bernier of my staff at (602) 340-4295.

Sincerely,



WFC/GAM/rw

cc: D. H. Coe
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