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WILLIAM L. STEWART  
EXECUTIVE VICE PRESIDENT  
NUCLEAR

102-03348-WLS/SAB/TNW  
May 5, 1995

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Secretary  
U. S. Nuclear Regulatory Commission  
ATTN: Docketing and Service Branch  
Washington, DC 20555-0001

DOCKET NUMBER  
PROPOSED RULE PR 50  
(60 FR 9634)

(25)

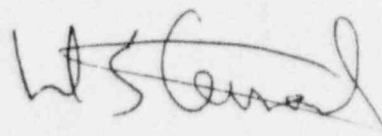
Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)**  
**Units 1, 2, and 3**  
**Docket Nos. STN 50-528/529/530**  
**Comments on Proposed Revision to 10 CFR 50 Appendix J**

Arizona Public Service Company (APS) submits the enclosed comments to the proposed revision to 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors." The proposed rule adds a "performance-based" option to the containment leakage testing requirements and was published for comment in the Federal Register on February 21, 1995.

Should you have any questions, please contact Scott A. Bauer at (602) 393-5978.

Sincerely,



WLS/SAB/TNW/rv  
Enclosure

cc: L. J. Callan  
K. E. Perkins  
K. E. Johnston  
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ENCLOSURE

COMMENTS ON PROPOSED REVISION TO 10 CFR 50

APPENDIX J

## **Comments On Proposed Revision to 10 CFR 50 Appendix J**

### **General Comments**

APS believes that the proposed revision to 10 CFR 50 Appendix J will result in a regulation that is highly efficient, while ensuring public health and safety. APS endorses the Nuclear Energy Institute (NEI) comments and urges the NRC to expeditiously promulgate the Option B Rule.

### **Technical Specification Requirements**

Section V.B.2 of the proposed rule states that the regulatory guide or other implementation document used by the licensee must be included, by general reference, in the plant's technical specifications. This is neither necessary nor warranted. Future commitments to implement Appendix J in accordance with the proposed new Option B should be provided solely in the Updated Final Safety Analysis Report (UFSAR) and controlled in accordance with the provisions of 10 CFR 50.59.

### **Visual Examination**

The NRC draft Regulatory Guide DG-1037, "Performance-Based Containment Leak Test Program," dated February 1995, Section C (3) states that visual examinations of accessible interior and exterior surfaces of the containment should be conducted prior to initiating a Type A test and during two other refueling outages before the next Type A test, if the interval for the Type A test has been extended to 10 years. This is neither necessary nor warranted. The visual examination is an appropriate prerequisite to pressurization of the containment for a Type A test, but it is not necessary to require additional visual examinations that are independent of a Type A test.