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USNRC

Arizona Public Service Company  
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WILLIAM L. STEWART  
EXECUTIVE VICE PRESIDENT  
NUCLEAR

102-03437-WLS/AKK/ACR  
August 4, 1995

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Mr. John C. Hoyle  
Secretary of the Commission  
Attention: Docketing and Service Branch  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

DOCKET NUMBER  
PROPOSED RULE **PR 52**  
(60FR17924)

Dear Mr. Hoyle:

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**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Dockets Nos. STN 50-528/529/530  
Comments on Proposed Design Certification Rules for  
Standardized Advanced Reactors  
(60 Federal Register 17902)**

On April 7, 1995, the Nuclear Regulatory Commission (NRC) issued for public comment the first proposed rules under 10 CFR Part 52 for design certification. The notices in the Federal Register pertained to the Standard Design Certification for the U. S. Advanced Boiling Water Reactor Design and the Standard Design Certification for the System 80+ Design. Arizona Public Service Company (APS) appreciates the NRC's efforts in striving to achieve an improved process for licensing future nuclear power plants. The NRC's efforts are to be commended.

APS has reviewed the Federal Register Notices, the ABB-CE comments, and a summary of the process deficiencies and recommendations raised by NEI following the industry review of the rule making notices. APS concurs with the ABB-CE comments and endorses the NEI/industry recommendations. It is fundamental that the licensing process be stable if utilities are to be able to consider nuclear as an option in the future. Please carefully review the ABB-CE comments and the NEI recommendations in this light. It is most important that the rules, when implemented, achieve sufficient licensing stability to convince utilities and their Boards of Directors that the new process is workable, allowing nuclear to be a viable option.

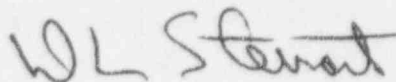
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Should you have any questions, please contact Ms. Angie Krainik at  
(602) 393-5421.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. L. Stewart". The signature is written in a cursive, flowing style with a horizontal line extending from the end.

WLS/AKK/ACR/dpr

cc: W. H. Rasin - NEI