



DS09  
R. Borchardt

64 FR 61142  
Nov. 9, 1999

Palo Verde Nuclear  
Generating Station

Gregg R. Overbeck  
Senior Vice President  
Nuclear

TEL (623) 393-5148  
FAX (623) 393-6077

Mail Station 7602  
P.O. Box 52034  
Phoenix, AZ 85072-2034

1

102-04381 -GRO/ AKK/DGM  
December 8, 1999

Mr. David L. Meyer  
Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Mail Stop: T6D59  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

RECEIVED  
1999 DEC 20 PM 3:21  
RULES & DIR. BRANCH  
US NRC

Reference: Revision of the NRC Enforcement Policy (64 Fed. Reg. 61142; November 9, 1999)

Dear Mr. Meyer:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2 and 3  
Docket Nos. STN 50-528/529/530  
Comment on Revision of the NRC Enforcement Policy**

The Palo Verde Nuclear Generating Station endorses the Nuclear Energy Institute (NEI) comments on the revisions to the Enforcement Policy, published November 9, 1999. (64 Fed. Reg. 61142).

As discussed in the NEI submittal, Palo Verde believes the revised Enforcement Policy is a clearer, more coherent guidance document. It reflects the NRC's extensive efforts to address industry and other stakeholder concerns. The instant revisions demonstrate the agency's commitment to a more risk informed, performance based regulatory scheme, and should make NRC enforcement action a more effective regulatory tool.

No commitments are being made to the NRC by this letter. Please contact Mr. Dan Marks at (623) 393-6492 if you have any questions regarding this matter.

Sincerely,

Add:  
R. Borchardt

**Rules and Directives Branch  
Office of Administration  
U. S. Nuclear Regulatory Commission  
Revision of the NRC Enforcement Policy : 1 11  
Page 2**

**GRO/AKK/DGM**

**cc: E. W. Merschoff [Region IV]  
M. B. Fields [NRR Project Manager]  
J. H. Moorman [Resident Inspector]  
R. W. Bishop [NEI]**