



Palo Verde Nuclear
Generating Station

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10 CFR 50.54(p)(2)

102-04602-CDM/SAB/RAS
August 31, 2001

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units: 1, 2, and 3
Dockets: 50-528, 50-529, 50-530
Licenses: NPF-41, NPF-51, NPF-74
PVNGS Security Training and Qualification Plan, Revision 14

Enclosed please find Revision 14 to the PVNGS Security Training and Qualification Plan (hereafter "Plan"), submitted and copied in accordance with 10 CFR 50.4(b)(4). Revision 14 of the Plan incorporates changes that:

- remove the proprietary classification of the document
- delete information redundant to the PVNGS Physical Security Plan
- correct grammatical errors
- clarify responsibilities for document and record retention
- update weapons training requirements
- add needed flexibility to physical agility testing.

APS has evaluated the changes incorporated into Revision 14 of the Plan in accordance with 10 CFR 50.54 and NRC Generic Letter 95-08 and has determined there is no decrease in safeguards effectiveness or the overall level of security system performance.

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2.790 per
Elaine McNeil

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While the majority of the changes incorporated in Revision 14 of the Plan will be implemented upon submittal of this correspondence, the herein described change affecting physical agility testing was made during the 2000 annual requalification process.

APS discovered the disparity between actual physical agility testing and Plan requirements during a recent self-assessment and has determined that while the change was prudent from an industrial safety perspective and had no effect on the outcome of security force qualifications, it was not reported within two months as required by 10 CFR 50.54(p)(2). This condition has been identified and is being corrected in accordance with the corrective action process.

Should you have questions regarding this submittal, please contact Angela K. Krainik at (623) 393-2099.

Sincerely,

*Carole L. Rind
for David
Mann*

CDM/SAB/RAS/ras

Enclosures:

1. Summary of changes to the PVNGS Security Training and Qualification Plan
2. Revision 14 of the PVNGS Security Training and Qualification Plan

cc: E. W. Merschoff (two copies)
L. R. Wharton
J. H. Moorman