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Palo Verde Nuclear
Generating Station

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10CFR 50.54(p)(2)

102-04819 -CDM/RAS
July 19, 2002

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
Docket Nos. STN 50-528/529/530
Submittal of PVNGS Physical Security Plan, Amendment 45

Pursuant to 10 CFR 50.34(c), Arizona Public Service Company (APS) hereby submits Amendment 45 to the PVNGS Physical Security Plan (hereafter Plan). This Plan amendment includes the security provisions necessary for the protection of spent fuel against the design basis threat of radiological sabotage at the Independent Spent Fuel Storage Installation (ISFSI). This submittal is being made in advance of completion of the ISFSI to facilitate staff review and inspection prior to spent fuel storage. Consequently, provisions of the Plan relating specifically to the ISFSI will not be effectual until the installation is complete, safeguards capabilities are available and functional, procedures are developed in accordance with Appendix C to Part 73, and appropriate personnel have been trained in accordance with the Training and Qualification Plan and applicable procedures to respond to ISFSI safeguards events.

The ISFSI security program has been designed in accordance with the provisions and requirements as are set forth in the current physical security plan and §73.55, with the additional conditions and exceptions granted through §72.212(b)(5). APS has evaluated the Plan changes in accordance with 10 CFR 50.54(p)(2) and NRC Generic Letter 95-08 and has concluded that the changes do not decrease the safeguards effectiveness of the Plan. The safeguards effectiveness evaluation for this Plan change is available upon request for NRC review.

*A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance*
Callaway ☐ Comanche Peak ☐ Diablo Canyon ☐ Palo Verde ☐ South Texas Project ☐ Wolf Creek

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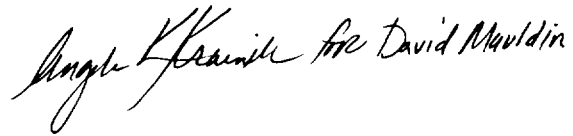
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The specific Plan changes are individually highlighted and justified in the ISFSI Security Compliance Matrix (Enclosure 1). The composite Plan (Enclosure 2) and summary of changes (Enclosure 3) are safeguards information and as such are being controlled in accordance with 10 CFR 73.21. The signed original and three copies of the Plan amendment are being submitted to the Document Control Desk and two additional copies are being forwarded to the Regional Administrator, NRC Region IV pursuant to 10 CFR 50.4(b)(4). No commitments are made to the NRC in this submittal.

APS is aware of the NRC draft order for ISFSIs and will be prepared to respond to the order's requirements as delineated by the order. APS will respond to the order in separate correspondence.

Should you have questions regarding this submittal, please contact Tom N. Weber at (623) 393-5764.

Sincerely,

A handwritten signature in black ink, appearing to read "David Mauldin".

CDM/RAS/ras

ENCLOSURES:

1. ISFSI SECURITY REQUIREMENTS COMPLIANCE MATRIX
2. PVNGS PHYSICAL SECURITY PLAN, AMENDMENT 45
3. SUMMARY OF CHANGES

cc:	NRC Region IV Administrator	(2 copies w/enclosures)
	NRC Resident Inspector	(w/enclosures)
	B. R. Manili	(w/enclosures)
	D. G. Naujock	(w/o enclosures)
	J. N. Donohew	(w/o enclosures)

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ENCLOSURE 1

ISFSI SECURITY REQUIREMENTS COMPLIANCE MATRIX

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