



Palo Verde Nuclear
Generating Station

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10 CFR 50.54(q)

**102-04845-CDM/SAB/RAS
September 26, 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
Dockets: 50-528, 50-529, 50-530
Licenses: NPF-41, NPF-51, NPF-74
PVNGS Emergency Plan Revision 27 and Associated Emergency
Plan Implementing Procedures**

Enclosed please find revisions to the PVNGS Emergency Plan and associated
Emergency Plan Implementing Procedures (EIPs), submitted pursuant to 10 CFR
50.54(q).

Noteworthy changes made to the Emergency Plan and EIPs include the addition of
guidance for declaring Notifications of Unusual Event based upon credible security threats
against the station, a new EIP that provides instructions to ensure the Emergency Plan
is implemented during security related emergency events, and the removal of the Site
Manager position from Emergency Plan activities.

The Emergency Plan, EIP-01, EIP-02, EIP-03, and EIP-04 became effective on
August 31, 2002. However, EIP-09 became effective on July 26, 2002. While the
implementation of EIP-09 was prudent and timely from a physical security
perspective, the subsequent failure to submit the change to the NRC within 30 days
does not meet reporting requirements and is contrary to APS management
expectations. Accordingly,

A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance

Callaway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek

A045

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APS is evaluating the condition in accordance with our corrective action process to ensure the condition does not recur.

Pursuant to Interim Compensatory Measure B.5.e of the NRC Order Modifying Licenses (February 25, 2002), APS has reviewed and validated the strategies for the escalation of Emergency Plan event classification and has revised the appropriate Emergency Plan and EIPs based upon NUMARC/NESP-007 HU4 guidance previously approved¹ by the NRC.

APS has evaluated the changes incorporated into Revision 27 of the Emergency Plan and related EIPs and has determined the changes do not decrease the effectiveness of the Emergency Plan and the plan, as changed, continues to comply with the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR 50.

In accordance with 10 CFR 50.4(b) and NRC Regulatory Issue Summary 01-005, copies of this report are being forwarded to the NRC Region IV Administrator and the resident inspector. Certain EIPs contain information considered private or proprietary (i.e., names and telephone numbers for use during an emergency) which have been redacted in accordance with NRC Generic Letter No. 81-27. Similarly, it is Arizona Public Service Company's position that the attached submittal, while not safeguards information, could be considered Sensitive Homeland Security Information and public release should be limited pursuant to 10 CFR §§ 9.17(a)(4) and 2.790(d)(1).

No commitments are being made to the NRC by this letter. Should you have questions regarding this submittal, please contact Thomas N. Weber at (623) 393-5764.

Sincerely,



CDM/SAB/RAS/ras

¹ NRC letter from Bruce A. Boger (Director, Division of Inspection Program Management, NRR) to Lynnette Hendricks (Director, Licensing Nuclear Generation, NEI) dated February 4, 2002.

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Enclosures:

1. Summary of Changes - PVNGS Emergency Plan & Emergency Plan Implementing Procedures (EPIPs)
2. Revision 27 of the PVNGS Emergency Plan
3. Emergency Plan Implementing Procedure EPIP-01
4. Emergency Plan Implementing Procedure EPIP-02
5. Emergency Plan Implementing Procedure EPIP-03
6. Emergency Plan Implementing Procedure EPIP-04
7. Emergency Plan Implementing Procedure EPIP-09

cc: E. W. Merschoff (two copies / CD-ROM)
J. N. Donohew (CD-ROM)
N. L. Salgado (CD-ROM)

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NO.	Pages with Redacted Information
EPIP-01	7, 10, 13, 16, 17, 23, 46, 114, 115, 118, 119, 129, 131,133, 137, 138, 148, 177, 180, 182, 185,433
EPIP-02	14, 32, 100,, 101, 104, 105, 115, 116, 117, 119, 123, 134, 163, 166, 168, 419
EPIP-03	8, 30, 49, 117, 118, 121, 122, 132 134, 136, 151, 180, 183, 185, 188 426
EPIP-04	43, 111,112, 115, 116, 126 130, 134, 135, 145, 174, 177, 179, 430
EPIP-09	6 ,7 ,8 ,10, 14 ,15, 16, 18,19, 20, 24

ENCLOSURE 1

SUMMARY OF CHANGES

**PVNGS EMERGENCY PLAN & EMERGENCY PLAN IMPLEMENTING
PROCEDURES (EPIPs)**

SUMMARY OF CHANGES
PVNGS Emergency Plan & Emergency Plan Implementing Procedures (EIPs)

Document	Page Nos.	Section(s)	Description of Change
EPLAN	39 of 92	Table 2	Revised <u>Security, Notification of Unusual Event</u> section to encompass "notification of a credible threat against PVNGS."
EPLAN	84 of 92	13.0	Added EPIP-09 to list of Emergency Plan Implementing Procedures.
EPIP-01	4 of 441	2.0	Deleted "Site Manager" position from responsibilities for emergency plan implementation.
EPIP-01	7 of 441	3.14	Deleted "Site Manager" notification from Affected Unit Shift Manager notifications.
EPIP-01	10 of 441	5.0	Deleted "Site Manager" notification from facility activation checklist.
EPIP-01	44 of 441	Appendix A	Revised Table 7: Security Event Category, to include "notification of a credible threat against PVNGS."
EPIP-01	49 of 441	Appendix B	Added note regarding the use of Appendix G for protective action recommendations.
EPIP-01	178 of 441	Appendix I	Added reference to EPIP-07 for applicable phone and fax numbers.
EPIP-01	181 of 441	Appendix I	Clarified buildings and/or areas to be searched.
EPIP-01	184 of 441	Appendix J	Clarified who may assist Security Director/Coordinator.
EPIP-01	185 of 441	Appendix J	Clarified areas requiring search (sweeps) after a site evacuation.
EPIP-01	367 of 441	Appendix P	Updated source documents.
EPIP-01	386 of 441	Appendix P	Revised EAL Bases document in accordance with NUMARC/NESP-007.
EPIP-01	387 of 441	Appendix P	Revised EAL Bases document in accordance with NUMARC/NESP-007.
EPIP-01	388 of 441	Appendix P	Updated source documents.
EPIP-01	389 of 441	Appendix P	Updated source documents.

SUMMARY OF CHANGES
PVNGS Emergency Plan & Emergency Plan Implementing Procedures (EPIPs)

Document	Page Nos.	Section(s)	Description of Change
EPIP-01	390 of 441	Appendix P	Updated source documents.
EPIP-02	30 of 427	Appendix A	Revised Table 7: Security Event Category, to include "notification of a credible threat against PVNGS."
EPIP-02	35 of 427	Appendix B	Added note regarding the use of Appendix G for protective action recommendations.
EPIP-02	164 of 427	Appendix I	Added reference to EPIP-07 for applicable phone and fax numbers.
EPIP-02	167 of 427	Appendix I	Clarified buildings and/or areas to be searched.
EPIP-02	170 of 427	Appendix J	Clarified who may assist Security Director/Coordinator.
EPIP-02	171 of 427	Appendix J	Clarified areas requiring search (sweeps) after a site evacuation.
EPIP-02	353 of 427	Appendix P	Updated source documents.
EPIP-02	372 of 427	Appendix P	Revised Initiating Condition, PVNGS Emergency Action Level & Technical Basis sections in accordance with NUMARC/NESP-007.
EPIP-02	373 of 427	Appendix P	Updated source documents.
EPIP-02	374 of 427	Appendix P	Updated source documents.
EPIP-02	375 of 427	Appendix P	Updated source documents.
EPIP-02	376 of 427	Appendix P	Updated source documents.
EPIP-03	47 of 444	Appendix A	Revised Table 7: Security Event Category, to include "notification of a credible threat against PVNGS."
EPIP-03	52 of 444	Appendix B	Added note regarding the use of Appendix G for protective action recommendations.

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PVNGS Emergency Plan & Emergency Plan Implementing Procedures (EIPs)

Document	Page Nos.	Section(s)	Description of Change
EPIP-03	181 of 444	Appendix B	Added reference to EPIP-07 for applicable phone and fax numbers.
EPIP-03	184 of 444	Appendix B	Clarified buildings and/or areas to be searched.
EPIP-03	187 of 444	Appendix J	Clarified who may assist Security Director/Coordinator.
EPIP-03	188 of 444	Appendix J	Clarified areas requiring search (sweeps) after a site evacuation.
EPIP-03	370 of 444	Appendix P	Updated source documents.
EPIP-03	389 of 444	Appendix P	Revised Initiating Condition, PVNGS Emergency Action Level & Technical Basis sections in accordance with NUMARC/NESP-007.
EPIP-03	390 of 444	Appendix P	Updated source documents.
EPIP-03	391 of 444	Appendix P	Updated source documents.
EPIP-03	392 of 444	Appendix P	Updated source documents.
EPIP-03	393 of 444	Appendix P	Updated source documents.
EPIP-04	41 of 444	Appendix A	Revised Table 7: Security Event Category, to include "notification of a credible threat against PVNGS."
EPIP-04	46 of 444	Appendix B	Added note regarding the use of Appendix G for protective action recommendations.
EPIP-04	175 of 444	Appendix I	Added reference to EPIP-07 for applicable phone and fax numbers.
EPIP-04	178 of 444	Appendix I	Clarified buildings and/or areas to be searched.
EPIP-04	181 of 444	Appendix J	Clarified who may assist Security Director/Coordinator.
EPIP-04	182 of 444	Appendix J	Clarified areas requiring search (sweeps) after a site evacuation.

SUMMARY OF CHANGES
PVNGS Emergency Plan & Emergency Plan Implementing Procedures (EPIPs)

Document	Page Nos.	Section(s)	Description of Change
EPIP-04	364 of 444	Appendix P	Updated source documents.
EPIP-04	383 of 444	Appendix P	Revised Initiating Condition, PVNGS Emergency Action Level & Technical Basis sections in accordance with NUMARC/NESP-007.
EPIP-04	384 of 444	Appendix P	Updated source documents.
EPIP-04	385 of 444	Appendix P	Updated source documents.
EPIP-04	386 of 444	Appendix P	Updated source documents.
EPIP-04	387 of 444	Appendix P	Updated source documents.
EPIP-09	1 through 24 of 24	All	<p><i>Note: The text included in this EPIP is new. The EPIP number (EPIP-09) was previously used and later discontinued. To maintain the numerical sequence of EPIP revisions, EPIP-09 is being re-issued as revision 2.</i></p> <p>This procedure provides direction for the Shift Manager (SM) / Emergency Coordinator (EC) to ensure the Emergency Plan is implemented during security related emergency events.</p>