



Palo Verde Nuclear
Generating Station

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EA-02-104

**102-04874GRO/RAS
December 20, 2002**

**U.S. Nuclear Regulatory Commission
ATTN: Mr. Glenn Tracy
Mail Stop T-4A9
Two White Flint North
11545 Rockville Pike
Rockville, Maryland 20852-2738**

**U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001**

- References: 1. Letter from G. R. Overbeck, APS, to G. Tracy, USNRC, dated November 5, 2002, Subject: Response to 20 Day Request and Answer to NRC Order Modifying General Licenses for Independent Spent Fuel Storage Installation (ISFSI)
2. Letter from M. J. Virgilio, USNRC, to J. M. Levine, APS, and Order Modifying Licenses dated October 16, 2002

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Docket Nos. STN 50-528, 50-529 and 50-530
Revised Response to 20 Day Request and Answer to
NRC Order Modifying General Licenses for Independent
Spent Fuel Storage Installation (ISFSI)**

This correspondence is being submitted to correct APS' previous submittal (reference 1) containing the description of actions being taken to comply with the October 16, 2002 ISFSI Security Order (reference 2). As noted during NRC Nuclear Security and Incident Response branch reviews, APS' initial response to the ISFSI Security Order was formatted in accordance with the Interim Compensatory Measures (ICMs) detailed in section B of Attachment 2 to the ISFSI Security Order as opposed to the ICMs in section C.

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Revised Response to 20 Day Request and Answer to NRC Order Modifying
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APS is correcting this error so that the description of actions reflect only those ICMs required for ISFSIs located on the owner controlled area. The error occurred during the developmental stages of APS' response to the Order and was not subsequently discovered due to the similarity between the three sets of ICMs. Regardless, the previously submitted schedule and actions being taken to achieve compliance with the ISFSI Security Order are unaffected by this error.

This response is submitted to the Commission in accordance with 10 CFR §2.202, §72.4 and §73.21. APS makes no commitments in this letter. If you have any questions concerning this matter, please contact me at 623-393-5148 or Mr. Scott Bauer at 623-393-5978.

Sincerely,



GRO/RAS/ras

Attachment: Revised Description of Actions Being Taken to Comply with
October 16, 2002 ISFSI Security Order (Safeguards Information)

cc:

E. W. Merschoff	(w/ Attachment)
S. R. Stein	(w/ Attachment)
J. N. Donohew	(w/o Attachment)
N. L. Salgado	(w/o Attachment)

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STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Gregg R. Overbeck, represent that I am Senior Vice President, Nuclear, and the foregoing Answer to NRC Order for Interim Safeguards and Security Compensatory Measures has been signed by me, with full authority to do so on behalf of the Arizona Public Service Company, and to the best of my knowledge and belief, the statements made therein are true and correct.


Gregg R. Overbeck

Sworn Before Me This 20 Day Of December, 2002.


Notary Public



Notary Commission Stamp