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**10 CFR 50.54(p)**



*A subsidiary of Pinnacle West Capital Corporation*

Palo Verde Nuclear  
Generating Station

**Dwight C. Mims**  
Vice President  
Regulatory Affairs and Plant Improvement

Tel. 623-393-5403  
Fax 623-393-6077

Mail Station 7605  
P. O. Box 52034  
Phoenix, Arizona 85072-2034

**102-06158-DCM/DFH**  
**March 25, 2010**

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2 and 3  
Docket No. STN 50-528; 50-529; 50-530 and 72-44  
License No. NPF-41; NPF-51; NPF-74  
PVNGS Security Plan, Training and Qualification Plan, Safeguards  
Contingency Plan, and Independent Spent Fuel Storage Installation  
Security Program, Revision 12**

Dear Sirs:

Pursuant to 10 CFR 50.54(p), Arizona Public Service (APS) hereby submits Revision 12 of the Palo Verde Nuclear Generating Station Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program (hereafter the Plan). This Plan implements Nuclear Energy Institute (NEI) 03-12, "Template for the Security Plan and Training Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Installation Security Program], Revision 6, dated April 2009.

APS applied for an exemption from the schedule requirement of 10 CFR Part 73, Physical Protection of Plants and Materials, paragraph 73.55(a)(1) for PVNGS Units 1, 2, and 3, pursuant to 10 CFR 73.5. On March 23, 2010, the Nuclear Regulatory Commission (NRC) approved the APS exemption request. The exemption is included in Revision 12 of the Plan.

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

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U.S. Nuclear Regulatory Commission  
PVNGS Security Plan, Training and Qualification Plan, Safeguards Contingency  
Plan, and Independent Spent Fuel Storage Installation Security Program,  
Revision 12  
Page 2

APS has evaluated the Plan changes in accordance with 10 CFR 50.54(p) and  
concluded that the revision does not result in a decrease in the effectiveness of  
the Plan.

No commitments are being made to the NRC by this letter.

The material enclosed herewith contains Safeguards Information as defined by  
10 CFR 73.21 and its disclosure to unauthorized individuals is prohibited by  
Section 147 of the Atomic Energy Act of 1954, as amended. Should you have  
questions concerning this matter, please contact Charles H. Coles, Department  
Leader, Security Operations at 623-393-2736.

Sincerely,

*D. C. Mine*

DCM/TNW/MNW/DFH

Enclosures:

- 1) Palo Verde Nuclear Generating Station Security Plan, Training and  
Qualification Plan, Safeguards Contingency Plan, and Independent Spent  
Fuel Storage Installation Security Program, Revision 12
- 2) 10 CFR 50.54(p) Table of Changes

cc: cover letter only:

E. E. Collins	Region IV Administrator
J. R. Halt	PVNGS Project Manager
L. K. Gibson	NRC NRR Project Manager
P. R. Frechette	Sr. Physical Security Inspector, RIV/DRS/PSB
R. I. Treadway	Sr. Resident Inspector

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