



A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear
Generating Station

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102-06176-DCM/GAM
April 29, 2010

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

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528, 50-529 and 50-530
Response to April 8, 2010, Request for Additional Information
Regarding Security Assessments, for the Review of the PVNGS
License Renewal Application**

By letter dated April 8, 2010, the Nuclear Regulatory Commission staff issued a request for additional information (RAI) related to the PVNGS license renewal application (LRA). Enclosure 1 contains Arizona Public Service Company's response to the April 8, 2010, RAI.

APS makes no commitments in this letter. Should you need further information regarding this submittal, please contact Russell A. Stroud, Licensing Section Leader, at (623) 393-5111.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 4/29/10
(date)

Sincerely,

D.C. Mims

DCM/RAS/GAM/GAT

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Enclosure: Response to April 8, 2010, Request for Additional Information Regarding
Security Assessments, for the Review of the PVNGS License Renewal
Application

cc: E. E. Collins Jr. NRC Region IV Regional Administrator
J. R. Hall NRC NRR Project Manager
L. K. Gibson NRC NRR Project Manager
R. I. Treadway NRC Senior Resident Inspector for PVNGS
L. M. Regner NRC License Renewal Safety Project Manager
D. M. Drucker NRC License Renewal Environmental Project Manager
G. A. Pick NRC Region IV (electronic)
Doug Huyck NRC
Beth Mizuno NRC

ENCLOSURE

**Response to April 8, 2010, Request for Additional
Information Regarding Security Assessments, for the
Review of the PVNGS License Renewal Application**

Enclosure

**Response to April 8, 2010, Request for Additional Information
for the Review of the PVNGS License Renewal Application**

NRC RAI Introduction

In order to complete its evaluation and address the risk associated with security/terrorist events, the staff has determined additional information is needed regarding plant-specific evaluations and mitigative measures completed. The staff requests the following information be provided. Please note that no classified information, safeguards information, or Sensitive Unclassified Non-Safeguards Information (SUNSI) is requested or to be provided:

NRC Request (a)

- a. *A listing of the significant security-related assessments performed subsequent to the events of 09/11/2001. Significant assessments performed by/for Arizona Public Service Company (e.g., self assessments, contractor assessments), industry (e.g., Electric Power Research Institute (EPRI), Nuclear Energy Institute (NEI)), and government (e.g., U.S. Nuclear Regulatory Commission and Department of Homeland Security) should be included in the listing.*

Arizona Public Service Company's Response to Request (a)

A number of significant security related assessments were performed for the Palo Verde Nuclear Generating Station (PVNGS) subsequent to September 11, 2001. These assessments were performed internally by Arizona Public Service Company (APS), the Department of Homeland Security (DHS), and the Nuclear Regulatory Commission (NRC).

An assessment of PVNGS was performed in 2005 that evaluated the station beyond the NRC's Design Basis Threat, and evaluated the resulting offsite consequences.

The NRC performed an inspection November 18, 2008, on the Interim Compensatory Measures associated with the mitigation strategies of an aircraft threat (10 CFR 50.54(hh)).

The PVNGS Emergency Preparedness Organization conducted an integrated response drill involving a hostile action at PVNGS on December 10, 2009.

Additional significant security assessments for PVNGS included NRC inspections conducted subsequent to September 11, 2001 in the following areas:

- Baseline Inspections
- Temporary Instructions (Material Control and Accounting, and Interim Compensatory Measures)
- Physical Security Reports and Investigative Reports
- Supplemental Inspections
- Closeout Inspection (Interim Compensatory Measures)
- Force on Force Inspections

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**Response to April 8, 2010, Request for Additional Information
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NRC Request (b)

- b. A summary of the key results and findings from the assessments identified in item (a) above, including the results of any offsite consequence assessment for security-related events.*

Arizona Public Service Company's Response to Request (b)

The areas of key findings associated with the assessments of the PVNGS security program have been discussed with the NRC staff. It was mutually concluded that these findings are Sensitive Unclassified Non-Safeguards Information (SUNSI) that will therefore not be provided in this submittal as specified in the RAI.

NRC Request (c)

- c. A summary or listing of the enhancements to plant hardware, personnel, or procedures as a result of the assessments.*

Arizona Public Service Company's Response to Request (c)

Enhancements were made in the areas listed below as a result of the assessments identified in the response to request (a). The enhancements included changes, modifications, or additions to plant hardware, personnel, or procedures.

Plant Hardware

- Physical Barriers
- Security Post and Structures
- Access Control Devices
- Access Requirements
- Searches
- Surveillance and Monitoring
- Personnel Equipment
- Communications
- Maintenance, Testing and Calibration of Security Equipment
- Compensatory Measures

Personnel

- Training for PVNGS non-Security Personnel
- Training for Security Personnel
- General Weapons

Procedures

- Work Hour Controls & Fatigue
- Large Aircraft Threats
- Physical Security Plan

Enclosure

**Response to April 8, 2010, Request for Additional Information
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Safety/Security Interface
Training and Qualification Plan
Safeguards Contingency Plan
Cyber Security Plan
Law Enforcement Response Plan
Independent Spent Fuel Storage Facility Security Program
Deliberate Acts
Emergency Plan
Emergency Plan Implementing Procedures.