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10 CFR 50.54(p)



A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear
Generating Station

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102-06197-DCM/DFH

May 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 13**

Dear Sirs:

Pursuant to 10 CFR 50.54(p), Arizona Public Service (APS) hereby submits Revision 13 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 revision incorporates NRC comments from their review of revision 12 of the Plan.

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.

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 13
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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,



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 13
- 2) 10 CFR 50.54(p) Table of Changes

cc: cover letter only:

E. E. Collins	Region IV Administrator
J. R. Hall	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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