



A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear
Generating Station

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102-06342-DCM/TLC
March 31, 2011

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 Second Request for Additional Information for the
Review of the PVNGS Cyber Security Plan**

By letter number 102-06226, dated July 22, 2010, Arizona Public Service Company (APS) submitted a request for approval of the PVNGS Cyber Security Plan (Agencywide Documents Access and Management System [ADAMS] Accession No. ML102150230). The U.S. Nuclear Regulatory Commission (NRC) staff issued a request for additional information (RAI) in a letter dated December 10, 2010 (Accession No. ML103440571), and APS responded to that RAI by letter dated January 20, 2011 (Accession No. ML110320077). In an e-mail dated March 1, 2011, the NRC staff issued a second RAI related to the PVNGS Cyber Security Plan submittal. The enclosure to this letter contains APS's response to this second RAI.

Each of the three questions in the RAI is an industry-generic question developed by NRC staff following discussions with the Nuclear Energy Institute (NEI) and the industry Cyber Security Task Force. The three questions involve the topics of Records Retention, Implementation Schedule, and Scope of Systems.

For each of the three questions, APS is providing a response consistent with an agreed upon method between NEI and the NRC Staff. These RAI responses will require changes in the license amendment request (LAR) for the PVNGS Cyber Security Plan. APS will provide a timely submittal of the updated PVNGS Cyber Security License Amendment Request (LAR) on a date that will be agreed upon through discussion with the PVNGS NRC Project Manager, Lauren Gibson.

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U.S. Nuclear Regulatory Commission
Response to Second Request for Additional Information for the Review of the PVNGS
Cyber Security Plan
Page 2

No commitments are being made by this letter. Should you need further information regarding this response, 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 3/31/11
(date)

Sincerely,

A.C. Mirna

DCM/RAS/TLC/gat

Enclosure: APS Response to Second NRC Request for Additional Information (RAI)
Regarding PVNGS Cyber Security Plan Submittal

cc:	E. E. Collins Jr.	NRC Region IV Regional Administrator
	L. K. Gibson	NRC NRR Project Manager for PVNGS
	J. R. Hall	NRC NRR Senior Project Manager
	M. A. Brown	NRC Senior Resident Inspector for PVNGS
	A. V. Godwin	Arizona Radiation Regulatory Agency
	T. Morales	Arizona Radiation Regulatory Agency

Sr. Physical Security Inspector, RIV/DRS/PSB