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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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102-06557-MLL/TNW/MAM/DFH
July 25, 2012

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 14**

Dear Sirs:

Pursuant to 10 CFR 50.54(p), Arizona Public Service (APS) hereby submits Revision 14 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 administrative changes to the Plan and template changes from the NEI 03-12, Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan (revision 7). It also includes administrative changes to Palo Verde and incorporates clarification obtained through NRC's Security Frequently Asked Question (SFAQ) program.

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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PVNGS Security Plan, Training and Qualification Plan, Safeguards Contingency
Plan, and Independent Spent Fuel Storage Installation Security Program,

Revision 14

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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 Larry McKinney, Department Leader, Security Operations at 623-393-2736.

Sincerely,



MLL/TNW/MAM/DFH/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 14
- 2) 10 CFR 50.54(p) Table of Changes

cc: cover letter only:

E. E. Collins Jr.	NRC Region IV Regional Administrator
L. K. Gibson	NRC NRR Project Manager [electronic / paper]
E. T. Byre	Sr. Physical Security Inspector, RIV/DRS/PSB
M. A. Brown	NRC Senior Resident Inspector for PVNGS