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10 CFR 50.54(p)

**MARIA L. LACAL**  
Senior Vice President  
Nuclear Regulatory and Oversight

**Palo Verde**  
**Nuclear Generating Station**  
P.O. Box 52034  
Phoenix, AZ 85072  
Mail Station 7605  
Tel 623.393.6491

102-07251-MLL/MAM  
June 03, 2016

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

Dear Sirs:

**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 19**

Pursuant to 10 CFR 50.54(p), Arizona Public Service (APS) hereby submits Revision 19 of the PVNGS Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation (ISFSI) Security Program (hereafter the Plan). This revision was implemented on May 13, 2016 and primarily incorporates changes made to the protected area at PVNGS, which included transitioning from old to new alarm stations, and the primary vehicle access portal. These and additional changes are described further in the enclosures.

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 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 Kevin Martinez, Security Operations Department Leader, at 623-393-2731.

Sincerely,

MLL/MAM

Date: 06-07-2016

Programs Standards, Safeguards Administrator  
Unauthorized disclosure may lead to civil and/or  
Criminal penalties.

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A member of the STARS (Strategic Teaming and Resource Sharing) Alliance  
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PVNGS Security Plan, Revision 19  
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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 19
- 2) 10 CFR 50.54(p) Table of Changes

cc: M. L. Dapas NRC Region IV Regional Administrator  
S. P. Lingam NRC NRR Project Manager for PVNGS  
M. M. Watford NRC NRR Project Manager  
C. A. Peabody NRC Senior Resident Inspector for PVNGS  
M. L. Chambers Sr. Physical Security Inspector, R-IV/DRS/PSB1

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**ENCLOSURE 1**

**Palo Verde Nuclear Generating Station Security Plan, Training  
and Qualification Plan, Safeguards Contingency Plan, and  
Independent Spent Fuel Storage Installation Security Program**

**Revision 19**

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