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10 CFR 50.54(p)

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102-07512-MLL/MEK  
June 14, 2017

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 20**

Pursuant to 10 CFR 50.54(p), Arizona Public Service (APS) hereby submits Revision 20 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, implemented on April 29, 2017, replaces ambiguous references to the Owner Controlled Area throughout the plan with proper references to the Security Owner Controlled Area (SOCA) and adds an appendix that elaborates on SOCA features. 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/MEK

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PVNGS Security Plan  
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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 20
- 2) 10 CFR 50.54(p) Table of Changes

cc: K. M. Kennedy           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 20**

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**Enclosure 2**

**10 CFR 50.54(p) Table of Changes**

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