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10 CFR 50.54(p)

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102-07677-MLL/MEK  
April 3, 2018

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 21**

Pursuant to 10 CFR 50.54(p), Arizona Public Service (APS) hereby submits Revision 21 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 February 6, 2018, incorporates Security Frequently Asked Question 12-05, NEI 03-12, Rev. 7 - Contingency Event #21, which provides informational instruction on response(s) to a suspected/confirmed cyber-attack. These 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 21
- 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  
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 21**

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