

SAFEGUARDS

10 CFR 50.54(p)(2)

Arizona Public Service Company
PALO VERDE NUCLEAR GENERATING STATION
P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

102-03250-ECS/AKK/JAK
February 15, 1995

BERT C. SIMPSON
VICE PRESIDENT
NUCLEAR SUPPORT

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Security Plan Amendment 37
File: 95-006-493; 95-056-026

Enclosed please find an original and three copies (controlled copy numbers 8-3, 8-4, and 8-9) of Amendment 37 to the PVNGS Security Plan. The three controlled copies contain replacement pages for copies of the Security Plan previously submitted to the NRC. In accordance with 10 CFR 50.4(b)(4)(iii), and by copy of this letter, Arizona Public Service Company (APS) is forwarding two controlled copies of Amendment 37 to the Regional Administrator, NRC Region IV.

This amendment does not decrease the effectiveness of the Security Plan, and therefore, is being made pursuant to 10 CFR 50.54(p). A summary of the changes is included as Enclosure 1 and the original of Security Plan Amendment 37 is included as Enclosure 2.

APS has determined that the original of the Security Plan, and the replacement pages, contain Safeguards Information and are subject to the controls of 10 CFR 73.21. These pages, so designated, are to be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790(d) and should not be placed in the Public Document Room.

Should you have any questions, please call Larry K. Houghtby at (602) 393-2527.

Sincerely,

(Signature)
for ECS

ECS/AKK/JAK/rv
Enclosures

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Security Plan Amendment 37
Page 2

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 Page 3

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ENCLOSURE 1

Summary of Security Plan Amendment 37

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Following are changes made in Amendment 37 of the PVNGS Security Plan:

Amendment 37 has been reformatted. Title and position changes have been made throughout the document. Amendment 37 has been formatted to single page rather than duplex. Blank pages have been removed. Amendment 37 is being submitted in its entirety.

1. Organizational Structure

PVNGS has made the following changes in its organization:

Executive Vice President, Nuclear - This position has not changed. The Executive Vice President, Nuclear reports directly to the President/CEO of APS and is directly responsible for all Nuclear activities at PVNGS.

Vice President, Nuclear Production - The Vice President, Nuclear Production, reports to the Executive Vice President and is responsible for all activities directly related to the operation of the 3 Units.

Vice President, Nuclear Support - The Vice President, Nuclear Support, reports to the Executive Vice President and is responsible for all support activities including Nuclear Security.

Unit Operations Managers - This position replaces the Unit Managers position. The Unit Operations Manager is responsible for the day-to-day activities in their respect Unit.

Director, PVNGS Services - This position has been removed from the PVNGS Organization. The Security Department Leader (Manager) no longer reports through this position.

Security Department Leader - The Security Manager title has been change to Security Department Leader. The Security Department Leader reports directly to the Vice President, Nuclear Support and no longer reports through a Director. The Security Department Leader is responsible for all activities of the PVNGS Security department.

Security Operations Section Leader - This is a new position. The Security Operations Section Leader reports to the Security Department Leader and is responsible for supervising the day-to-day activities of the Security Operations section.

Security Administration Section Leader - This position title replaces the Administration and Technical Supervisor. The Security Administration Section Leader reports to the Security Department Leader and is responsible for administrative activities such as the Security Plan, procedures, Safeguards program and 73.71 reporting.

Security Access Control/CPF Section Leader - This position title has changed from Access Control & Training Supervisor. This position no longer is responsible for training activities. The Access Control/CPF Section Leader reports to the Security Department Leader and is responsible for background investigations and authorization of unescorted access to the PVNGS Protected/Vital areas.

Security Training Section Leader - This position reports to the Security Department Leader and is responsible for all training activities of the PVNGS Security department.

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Security Shift Team Leader - This position has change from Security Shift Supervisor. The Security Shift Team Leader reports to the Security Operations Section Leader and is mainly responsible for the day-to-day activities of the onshift Security personnel in the Protected Area.

Security Shift Sergeant - This position's title and responsibilities have not changed.

A diagram of the Reporting structure for the Security Organization is found on page 1-30.

2. **Access Authorization**

Authorization for unescorted/escorted access is now the responsibility of the Vice President, Nuclear Production or personnel designated by him/her.

3. **Other Changes**

A description of Seismic Gaps between buildings of each Unit has been added on Page 5-3. Each building in a Unit has required seismic gaps between the buildings to meet federal requirements for structures at nuclear facilities.

Section 1.4.7 - Page 1-10 - The wording " except as noted in section 8.2" has been removed from the second paragraph. This was done at the request of the NRC from review of amendment 35 & 36.

Section 4.4 , Page 4-1 - Deleted the statement " There are no fixed posts as defensive positions in the Protected Area". Security presently utilizes a fixed post to provide for the Design Basis Threat.

Section 8.1 , Page 8-6, General - The word "specific" was removed from the second paragraph which read "designed to protect specific Vital equipment". This was done at the request of the NRC from review of amendment 35 & 36.

Page 1-30 - A new organizational chart has been added.

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ENCLOSURE B

Security Plan Amendment 37

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ENCLOSURE 2

Security Plan Amendment 37

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