



## SAFEGUARDS INFORMATION

Palo Verde Nuclear  
Generating Station

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102-03802-JAB/AKK/DLK  
October 30, 1996

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

Reference: Letter dated August 29, 1996, from K. E. Brockman, USNRC  
to W. L. Stewart, APS

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2, and 3  
Docket Nos. STN 50-528/529/530  
PVNGS Physical Security Plan, Amendment 41**

The PVNGS Physical Security Plan was amended on October 6, 1996. The amendment incorporated organizational changes within the Security Department, physical changes made to the protected area boundary, clarification to the description of the outer perimeter isolation zone, and drawing changes. Also included are the corrections to the Security Plan that were requested in the referenced letter.

The changes made in Amendment 41 resolved all issues identified in attachments 1 and 2 of the referenced letter. APS has evaluated and enhanced the Security Plan change review process to ensure future changes are subjected to a more thorough review. Additionally, a more conservative approach will be used in deciding whether to submit changes to the Security Plan under 10 CFR 50.54(p) or 10 CFR 50.90.

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The referenced letter contained comments on changes submitted in Amendment 40 that require further clarification and requested that corrected pages be provided in the next amendment. APS will address those changes that require further clarification in Amendment 43.

The referenced letter also contained the following comment:

"The change in this revision [40] also proposed to remove drawings of vital areas from the security plan. In this regard, during the above telephone conversation we understood that Table 4-D, 'Vital Island Locations and Boundaries,' would list the alarm components of all operable doors, portals, hatches, etc., in all vital areas."

A more clear restatement of the referenced telephone conversation would be that all information included on the drawings can be found or derived from information included in Table 4-D with the exception of the actual visual representation of the location of the vital area doors, portals, and hatches. The drawings, originally included in Amendment 39, did not include alarm component details.

In conclusion, we appreciate your staff's professionalism in working through these issues to achieve an improved and simplified Security Plan that meets the appropriate regulations for PVNGS.

Amendment 41 does not decrease the effectiveness of the PVNGS Physical Security Plan and therefore was accomplished in accordance with the provisions of 10 CFR 50.54(p). A summary of the changes is included in Enclosure 1, Enclosure 2 contains justification for the changes, and Enclosure 3 contains Amendment 41 to the PVNGS Physical Security Plan. Pursuant to 10 CFR 50.4(b)(4)(iii), three copies of Amendment 41 are included in this submittal; additionally, two copies are being forwarded to the Regional Administrator, NRC Region IV.

APS has determined that the PVNGS Physical Security Plan contains Safeguards Information and is subject to the controls of 10 CFR 73.21. The 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.

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Should you have any questions, please contact Craig K. Seaman at (602) 393-2099.

Sincerely,



JAB/AKK/DLK/dpr

Enclosures:

1. Summary of Changes to the PVNGS Physical Security Plan
2. Justification of Changes to the PVNGS Physical Security Plan
3. Amendment 41 to the PVNGS Physical Security Plan

cc: L. J. Callan (with Enclosures and one copy of Amendment 41)  
K. E. Brockman  
A. B. Earnest  
K. E. Johnston

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