



Palo Verde Nuclear  
Generating Station

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102-05511-JML/SAB/RMW/RJR  
June 8, 2006

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
11555 Rockville Pike  
Rockville, Maryland 20852

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2 and 3  
Docket Nos. STN 50-528, 50-529 and 50-530  
60-Day Response to NRC Generic Letter 2006-03, "Potentially  
Nonconforming Hemyc and MT Fire Barrier Configurations"**

NRC Generic Letter (GL) 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations," dated April 10, 2006, was issued to request information from licensees regarding Hemyc and MT fire barriers, or other fire barriers using the materials and configurations described in the generic letter.

GL 2006-03 requested that all addressees provide a response that contains the following information:

1. *Within 60 days of the date of this GL, provide the following:*
  - a. *A statement on whether Hemyc or MT fire barrier material is used at their NPPs and whether it is relied upon for separation and/or safe shutdown purposes in accordance with the licensing basis, including whether Hemyc or MT is credited in other analyses (e.g., exemptions, license amendments, GL 86-10 analyses).*
  - b. *A description of the controls that were used to ensure that other fire barrier types relied on for separation of redundant trains located in a single fire area are capable of providing the necessary level of protection. Addressees may reference their responses to GL 92-08 to the extent that the responses address this specific issue.*

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2. *Within 60 days of the date of this GL, for those addressees that have installed Hemyc or MT fire barrier materials, discuss the following in detail:*
  - a. *The extent of the installation (e.g., linear feet of wrap, areas installed, systems protected),*
  - b. *Whether the Hemyc and/or MT installed in their plants is conforming with their licensing basis in light of recent findings, and if these recent findings do not apply, why not,*
  - c. *The compensatory measures that have been implemented to provide protection and maintain the safe shutdown function of affected areas of the plant in light of the recent findings associated with Hemyc and MT installations, including evaluations to support the addressees' conclusions, and*
  - d. *A description of, and implementation schedules for, corrective actions, including a description of any licensing actions or exemption requests needed to support changes to the plant licensing basis.*
3. *No later than December 1, 2007, addressees that identified in 1.a. Hemyc and/or MT configurations are requested to provide a description of actions taken to resolve the nonconforming conditions described in 2.d.*

**APS Response:**

PVNGS does not use Hemyc or MT fire barrier materials for fire barrier separation of redundant post fire safe shutdown circuits.

PVNGS utilizes Thermo-Lag as raceway fire barrier protection for redundant trains located in the same fire area to satisfy 10 CFR 50, Appendix R, III.G requirements as discussed in APS letters 102-02478-WFC/JNI, "Response to NRC Generic Letter 92-08," dated April 16, 1993, 102-02658-WFC/RAB/JNI, "Response to Request for Additional Information - Generic Letter 92-08," dated September 27, 1993, 102-03211-WFC/NLT, "Response to Follow-up to Request for Additional Information Regarding Generic Letter 92-08," dated December 22, 1994, and NRC letter dated June 11, 1998, concerning the completion of Licensing Actions for Generic Letter 92-08 (TAC NOS. M85583, M85584, and M85585).

Test reports, previous correspondence, and additional information are available on site.

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and MT Fire Barrier Configurations"  
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Requested information items 2 and 3 of Generic Letter 2006-03 do not apply to PVNGS.

There are no commitments made to the NRC by this letter. If you have any questions,  
please contact Thomas N. Weber at (623) 393-5764.

Sincerely,



JML/SAB/RMW/gt

Enclosure: Notarized affidavit

cc:	B. S. Mallett	NRC Region IV Regional Administrator
	M. B. Fields	NRC NRR Project Manager
	G. G. Warnick	NRC Senior Resident Inspector for PVNGS

