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**Jerry C. Roberts**  
Director  
Nuclear Safety Assurance

June 1, 2000

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station  
Docket No. 50-416  
License No. NPF-29  
Plans to Address Kaowool Issues

Reference: SECY-99-204, dated August 4, 1999, "Kaowool and FP-60 Fire Barriers"

GNRO-2000/00042

Gentlemen:

We have reviewed the referenced SECY-99-204 and recognize the Staff's concerns with the ability of the Kaowool Fire Barrier system to provide adequate fire protection for equipment that needs to remain functional both during and after any postulated fire in the plant. These concerns were promulgated due to the lack of a sound technical basis for the establishment of a fire endurance rating for the Kaowool Fire Wrap System.

GGNS was correctly characterized in the SECY as being one of the plants that rely on Kaowool for protection of safe shutdown capability and that GGNS is one of the four plants that had not elected to eliminate the use of Kaowool to meet NRC fire protection requirements. We have developed and are currently implementing a program plan to assess the adequacy of our installed Kaowool fire barriers for meeting NRC requirements. We are actively participating in an information exchange with the other affected licensees to share and exchange action plans, information and test data.

The overall objectives of our qualification program are:

1. Identify all plant configurations of fire barriers that contain Appendix R required Kaowool wrapped raceways.
2. Establish bounding configurations for qualification testing.
3. Establish acceptability of the Kaowool Raceway Fire Wrap design at GGNS based on a compliment of fire test results and engineering evaluations that are acceptable to the NRC.

4. Implement necessary upgrades/replacement for Kaowool Fire Wrap Configurations determined to be unacceptable.

We would be happy to meet with the Staff to discuss our qualification plan, either independently or jointly with the other three plants that rely on Kaowool as discussed in SECY-99-204, if requested by the Staff. In the interim, we have established compensatory measures (fire watches) and will proceed with implementation of our qualification program.

We will keep you apprised of any significant deviations from our proposed resolution strategy and will provide written confirmation to the Staff once all actions to address regulatory and technical concerns associated with the use of Kaowool at GGNS have been completed.

Should you have any questions or require additional information regarding this matter, please contact Charles E. Brooks at 601-437-6555.

Yours truly,



JCR/CEB

cc:

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