



**Nebraska Public Power District**

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50.54

NLS2006047  
May 30, 2006

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

**Subject:** Response to NRC Generic Letter 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations," dated April 10, 2006  
Cooper Nuclear Station, Docket No. 50-298, License No. DPR-46

**Reference:** NRC Generic Letter 2006-03, dated April 10, 2006, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations"

The purpose of this letter is for Nebraska Public Power District (NPPD) to provide the information requested by the referenced Generic Letter (GL) 2006-03. The Nuclear Regulatory Commission (NRC) issued the GL to confirm compliance with existing applicable regulatory requirements in light of information provided in the GL regarding Hemyc and MT fire barrier systems, and if appropriate, take additional actions. Specifically, although Hemyc and MT fire barriers may be relied on to protect electrical and instrumentation cables and equipment that provide safe shutdown capability during a fire, NRC testing has revealed that both materials failed to provide the protective function intended for compliance with existing regulations. The NRC requested licensees to provide a written response within 60 days describing the use of Hemyc, MT and other fire barrier systems at their nuclear power plants. The requested information is to be submitted under the requirements of 10 CFR 50.54(f).

The Cooper Nuclear Station (CNS) response to the requested information in GL 2006-03 is contained in the attachment to this submittal. NPPD is not making any commitments as a result of this response.

Should you have any questions or require additional information, please contact Paul Fleming, Licensing Manager, at (402) 825-2774.

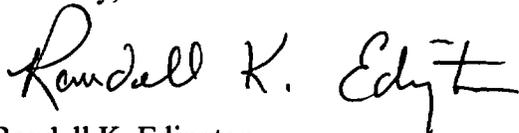
NLS2006047

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 5/30/06  
Date

Sincerely,



Randall K. Edington  
Vice President-Nuclear and  
Chief Nuclear Officer

/js

Attachment

cc: Regional Administrator w/attachment  
USNRC - Region IV

Cooper Project Manager w/attachment  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector w/attachment  
USNRC - CNS

Nebraska Health and Human Services w/attachment  
Department of Regulation and Licensure

NPG Distribution w/attachment

CNS Records w/attachment

**RESPONSE TO GENERIC LETTER 2006-03,  
"POTENTIALLY NONCONFORMING HEMYC AND MT FIRE BARRIER  
CONFIGURATIONS"**

**NRC Requested Actions**

*Within 60 days of the date of this letter [April 10, 2006], addressees are requested to determine whether or not Hemyc or MT fire barrier material is installed and relied upon for separation and/or safe shutdown purposes to satisfy applicable regulatory requirements. In addition, licensees are asked to describe controls that were used to ensure the adequacy of other fire barrier types, consistent with the assessment requested in GL 92-08.*

*Addressees that credit Hemyc or MT for compliance are requested to provide information regarding the extent of installation, whether the material complies with regulatory requirements, and any compensatory actions in place to provide equivalent protection and maintain safe shutdown function of affected areas of the plant in light of the recent findings associated with Hemyc and MT. Licensees are requested to provide evaluations to support conclusions that they are in compliance with regulatory requirements for the Hemyc and MT applications. Licensees that cannot justify their continued reliance on Hemyc or MT are requested to provide a description of corrective actions taken or planned and a schedule for milestones, including when full compliance will be achieved.*

*Compensatory measures and corrective actions must be implemented in accordance with existing regulations commensurate with the safety significance of the nonconforming condition. The NRC expects all licensees to fully restore compliance with 10CFR50.48 and submit the required documentation to the NRC by December 1, 2007.*

**NPPD Response to Requested Actions**

NPPD has taken the actions requested within 60 days and the responses are provided below.

**NRC Requested Information**

*NRC Request 1(a) - Within 60 days of the date of this GL [April 10, 2006], provide a statement on whether Hemyc or MT fire barrier material is used 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).*

**NPPD Response to Request 1(a):**

Hemyc or MT fire barrier material is not installed at CNS. CNS does not rely on either Hemyc, MT or other fire wrap material for separation and/or safe shutdown purposes.

***NRC Request 1(b)*** - Within 60 days of the date of this GL [April 10, 2006], *provide 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.*

**NPPD Response to Request 1(b):**

Procedures that implement the CNS Fire Hazards Analysis (FHA) provide controls of fire barrier types relied upon for separation and/or safe shutdown purposes in accordance with the CNS licensing basis. Fire barriers are assigned based on the construction features associated with the barrier that meet industry acceptance criteria. Construction features such as barrier material, barrier thickness, fire damper design, fire door design and penetration seal assemblies are reviewed as part of assigning a rating to an individual barrier. All barriers are documented in the FHA along with the fire rating.

It should also be noted that the concerns in GL 92-08 were resolved for CNS per Letter from James R. Hall, U.S. Nuclear Regulatory Commission to Guy R. Horn, Nebraska Public Power District, dated May 30, 1995, "Response to NRC Generic Letter (GL) 92-08, Thermo-Lag 330-1 Fire Barriers - Cooper Nuclear Station (TAC No. M85540)". Design changes were instituted that resulted in the removal of all Thermo-Lag 330-1 material.

***NRC Request 2(a)*** - Within 60 days of the date of this GL letter [April 10, 2006], *for those addressees that have installed Hemyc or MT fire barrier materials, discuss the extent of the installation (e.g., linear feet of wrap, areas installed, systems protected).*

**NPPD Response to Request 2(a):**

Per the response to Request 1(a), Hemyc or MT fire barrier material is not installed at CNS.

***NRC Request 2(b)*** - Within 60 days of the date of this GL letter [April 10, 2006], *for those addressees that have installed Hemyc or MT fire barrier materials, discuss 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.*

**NPPD Response to Request 2(b):**

Per the response to Request 1(a), Hemyc or MT fire barrier material is not installed at CNS.

***NRC Request 2(c)*** - Within 60 days of the date of this GL letter [April 10, 2006], *for those*

*addressees that have installed Hemyc or MT fire barrier materials, 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.*

**NPPD Response to Request 2(c):**

Per the response to Request 1(a), Hemyc or MT fire barrier material is not installed at CNS.

*NRC Request 2(d) - Within 60 days of the date of this GL letter [April 10, 2006], for those addressees that have installed Hemyc or MT fire barrier materials, provide 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.*

**NPPD Response to Request 2(d):**

Per the response to Request 1(a), Hemyc or MT fire barrier material is not installed at CNS.

*NRC Request 3: - No later than December 1, 2007, addressees that identified in 1.a. Hemyc or MT configurations are requested to provide a description of actions taken to resolve the nonconforming conditions described in 2.d.*

**NPPD Response to Request 3:**

Per the response to Request 1(a), Hemyc or MT fire barrier material is not installed at CNS.

