



Crystal River Nuclear Plant
Docket No. 50-302
Operating License No. DPR-72

Ref.: 10 CFR 50.54(f)

June 1, 2006
3F0606-01

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

Subject: Crystal River Unit 3 – Response to NRC Generic Letter 2006-03, Potentially Nonconforming Hemyc and MT Fire Barrier Configurations

Dear Sir:


Pursuant to 10 CFR 50.54(f), Florida Power Corporation, now doing business as Progress Energy Florida, Inc., hereby submits the Crystal River Unit 3 (CR-3) response to NRC Generic Letter 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations." The Generic Letter (GL) requested that CR-3 provide information by June 9, 2006 (i.e., 60 days from the GL issue date), regarding 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, CR-3 was asked to describe controls used to ensure the adequacy of other fire barrier types, consistent with the assessment requested in NRC Generic Letter 92-08.

The Enclosure contains the CR-3 response to Requested Information Items 1.a and 1.b. Requested Information Items 2 and 3 are not applicable since Hemyc and MT fire barrier materials are not installed at CR-3.

No regulatory commitments contained in this submittal.

If you have any questions regarding this submittal, please contact Mr. Paul Infanger, Supervisor, Licensing and Regulatory Programs, at (352) 563-4796.

Sincerely,


Dale E. Young
Vice President
Crystal River Nuclear Plant

Enclosure: 60-Day Required Response to NRC Generic Letter 2006-03, Potentially Nonconforming Hemyc and MT Fire Barrier Configurations

DEY/dwh


xc: Regional Administrator, Region II (w/enclosure)
CR-3 Resident Inspector (w/enclosure)
NRR Project Manager (w/enclosure)

Progress Energy Florida, Inc.
Crystal River Nuclear Plant
15760 W. Powerline Street
Crystal River, FL 34428

A125

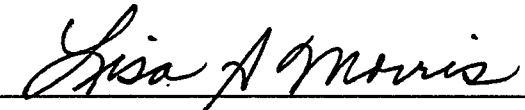
STATE OF FLORIDA
COUNTY OF CITRUS

Dale E. Young states that he is the Vice President, Crystal River Nuclear Plant for Florida Power Corporation, doing business as Progress Energy Florida, Inc. (PEF); that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.

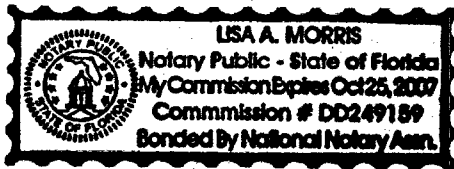


Dale E. Young
Vice President
Crystal River Nuclear Plant

The foregoing document was acknowledged before me this 1st day of June, 2006, by Dale E. Young.



Signature of Notary Public
State of Florida



LISA A MORRIS

(Print, type, or stamp Commissioned
Name of Notary Public)

Personally Produced
Known X -OR- Identification _____

PROGRESS ENERGY FLORIDA, INC.

CRYSTAL RIVER – UNIT 3

DOCKET NUMBER 50-302/LICENSE NUMBER DPR-72

ENCLOSURE

**60-DAY REQUIRED RESPONSE TO NRC GENERIC LETTER 2006-03, POTENTIALLY
NONCONFORMING HEMYC AND MT FIRE BARRIER CONFIGURATIONS**

60-DAY REQUIRED RESPONSE TO NRC GENERIC LETTER 2006-03

All addressees are requested to provide 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).

CR-3 Response to 1.a:

Hemyc and MT fire barrier materials are not used at CR-3. These fire barrier materials are not relied upon for separation and/or safe shutdown purposes in accordance with the CR-3 licensing basis and are not credited in other CR-3 analyses (e.g., exemptions, license amendments, NRC Generic Letter 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.

CR-3 Response to 1.b:

Thermo-Lag and Mecatiss fire barrier materials are used at CR-3. These fire barrier materials are relied upon for separation and/or safe shutdown purposes in accordance with the CR-3 licensing basis and are credited in other CR-3 analyses (e.g., exemptions, license amendments, NRC Generic Letter 86-10 analyses).

Thermo-Lag

In a letter (3N0999-06) dated September 3, 1999, "Completion of Licensing Action For Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers," dated December 17, 1992, For Crystal River Unit 3 (TAC No. M85541)," the NRC staff concluded that Florida Power Corporation (FPC), now doing business as Progress Energy Florida, Inc., had provided the information requested in Generic Letter 92-08 and that the actions tracked by TAC No. M85541 were complete. This conclusion followed a number of submittals, NRC requests for additional information, and associated responses.

On May 21, 1998, the NRC issued a Confirmatory Order (3N0598-11) modifying the CR-3 Operating License. This Order confirmed FPC's commitment, as stated in letter (3F0498-22) dated April 10, 1998, to complete implementation of Thermo-Lag 330-1 fire barriers corrective actions by June 30, 2000.

On May 25, 2000, FPC responded (3F0500-17) to the NRC Confirmatory Order by stating that the Thermo-Lag 330-1 corrective actions had been completed.

Mecatiss

Use of Mecatiss fire barrier materials at CR-3 was reviewed and approved by the NRC in letter (3N0197-19) dated January 29, 1997, "Crystal River Nuclear Generating Plant Unit 3 – Safety Evaluation of Mecatiss Fire Barrier Test Program (TAC No. M91772)."

The NRC concluded that the Mecatiss fire barrier system, when designed and installed in accordance with the techniques utilized for the test specimens, meets the acceptance criteria specified in Supplement 1 to Generic Letter 86-10 and is, therefore, acceptable for fire barrier systems relied upon by CR-3 to meet NRC fire protection requirements for the following raceway types and sizes:

- *Mecatiss MPF-60*
- *Mecatiss MPF-180*
- *Mecatiss MTS-1*
- *Mecatiss MTS-3*

CR-3 Installations:

CR-3 installations include the following Mecatiss and Mecatiss/Thermo-lag systems:

<i>Mecatiss MPF-60</i>	<i>One hour (one layer) upgrade over existing one hour Thermo-Lag 330-1 (TSI)</i>
<i>Mecatiss MPF-180</i>	<i>Three hour (two layers) upgrade over existing three hour Thermo-Lag 330-1 (TSI)</i>
<i>Mecatiss MTS-1</i>	<i>One hour (two layers) stand alone on raceways. Supports have one layer of protection</i>
<i>Mecatiss MTS-3</i>	<i>Three hour (four layers) stand alone on raceway. Supports have two layers of protection</i>

In addition, CR-3 credits Thermo-Lag installations in the following locations:

*Auxiliary Building - 95' Elevation
Auxiliary Building - 119' Elevation
Intermediate Building - 119' Elevation*

NRC letter (3N1097-39), "Exemption From Certain Requirements Of 10CFR50 Appendix R Fire Protection Program For Nuclear Power Facilities, (TAC No. M95817)," dated October 29, 1997, provides an exemption for certain fire zones on elevations 95' and 119' of the CR-3 Auxiliary Building, and on elevation 119' of the CR-3 Intermediate Building, allowing use of automatic fire detection and enhanced sprinkler protection instead of Thermo-Lag fire barrier upgrades.

CR-3 fire barrier installations are inspected at an established frequency in accordance with station procedures to ensure the installations are intact. Mecatiss and Mecatiss/Thermo-Lag systems are inspected using Surveillance Procedure SP-820, "Mecatiss Fire Barrier Inspection." Thermo-Lag installations are inspected using Surveillance Procedure SP-810, "TSI Fire Barrier Check."

From a design controls standpoint, CR-3 utilizes engineering design controls implemented via procedures EGR-NGGC-0005, "Engineering Change," and EGR-NGGC-0102, "Safe Shutdown/Fire Protection Review," to ensure that fire barrier types specified for use in the plant for separation and/or safe shutdown purposes meet regulatory requirements. This review is performed by the CR-3 Fire Protection Engineer and/or Safe Shutdown Engineer as part of the engineering design change package review and approval process.

Conclusion

The CR-3 configurations using Mecatiss and Mecatiss/Thermo-Lag have been fully tested and are qualified for use at CR-3. Thermo-Lag installations have been reviewed and approved with the provision that they do provide an adequate level of protection, with the supplemental enhanced sprinkler protection and administrative controls. Therefore, the issues identified in NRC Generic Letter 2006-03 are not a concern at CR-3.

Generic Letter 2006-03 Requested Information Items 2 and 3 are not applicable since Hemyc and MT fire barrier materials are not used at CR-3.