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Rick J. King
Director, Nuclear Safety Assurance

RBG-46570

June 1, 2006

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

SUBJECT: Response to Generic Letter 2006-03
River Bend Station Unit 1
Docket No. 50-458
License No. NPF-47

REFERENCE NRC Generic Letter 2006-03, dated April 10, 2006, "Potentially
Nonconforming Hemyc and MT Fire Barrier Configurations" (RBC-50397)

Dear Sir or Madam:

Per the above reference, the NRC issued Generic Letter (GL) 2006-03 to request facilities to confirm compliance with existing applicable regulatory requirements, and if appropriate, take additional actions. The River Bend Station (RBS) response to the requested information in GL 2006-03 is contained in the attachment to this letter. No commitments are identified in this submittal.

If you have any questions or require additional information, please contact Mr. Bill Fountain at 225-381-4625.

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The requested information is being made under the requirements of 10 CFR 50.54(f).
I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 1, 2006.

Sincerely,



Rick J. King
Director, Nuclear Safety Assurance

RJK/DNL/wjf

Attachment: RBS Response to Generic Letter 2006-03

cc: Dr. Bruce S. Mallett
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
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NRC Sr. Resident Inspector
P. O. Box 1050
St. Francisville, LA 70775

Mr. Bhalchandra Vaidya
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Attachment to RBG-46570

RBS Response to Generic Letter 2006-03

NRC Requested Actions

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.

NRC Request 1(a)

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).

RBS Response to Request 1(a):

No Hemyc or MT fire barrier material is installed at RBS. RBS therefore does not rely on either Hemyc or MT for separation and/or safe shutdown purposes to meet 10CFR50 Appendix R requirements.

NRC Request 1(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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RBS Response to Request 1(b):

River Bend Station relies solely on Thermo-Lag 330 in order to fulfill the requirement of 10CFR50 Appendix R, Section III.G.2.c for electrical raceway enclosures.

In October 1989, following the fire test failure of site specific Thermo-Lag 330, 3-hour rated fire protection enclosures, River Bend Station declared all of its Thermo-Lag configurations unable to meet the requirements of 10CFR50 Appendix R, Section III.G.2. Hourly fire watch patrols were immediately established in all fire areas containing Thermo-Lag barriers and LER 90-003 was issued. An industry Thermo-Lag fire endurance test program was subsequently established by the Nuclear Energy Institute (NEI). The industry program conducted a number of fire tests to document performance of various baseline and upgraded Thermo-Lag fire barrier assemblies. The NEI initiative also included development of a guideline to assist utilities in evaluating their Thermo-Lag fire barrier configurations for compliance with respect to the guidance provided by the series of NRC Bulletins and Generic Letters.

In 1995, RBS developed a new post-fire safe shutdown analysis to reduce the plant's dependence on Thermo-Lag as a fire rated barrier. New Thermo-Lag configurations replaced the previous configurations, using new material based on successful NEI test results. All Thermo-Lag enclosures were configured as one-hour fire rated barriers.

An NEI Application Guide was used to evaluate the new Thermo-Lag enclosures. The application guide provided a methodology for evaluating equivalency between tested and installed Thermo-Lag configurations and is consistent with the process previously established by Generic Letter 86-10. Detailed evaluations for raceway segments are documented. The evaluations demonstrate that all Thermo-Lag fire barriers installed to protect raceways and commodities are bounded by configurations qualified by previous successful fire endurance tests.

On November 4, 1996, the NRC issued a letter closing their review of Bulletin 92-01. On May 21, 1997, the NRC issued a letter acknowledging completion of licensing action for Generic Letter 92-08. RBS requirements for dependable and functional fire barriers have been adequately demonstrated.

NRC Request 2(a)

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).

RBS Response to Request 2(a):

No Hemyc or MT fire barrier material is installed at RBS.

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NRC Request 2(b)

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.

RBS Response to Request 2(b):

No Hemyc or MT fire barrier material is installed at RBS.

NRC Request 2(c)

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..

RBS Response to Request 2(c):

No Hemyc or MT fire barrier material is installed at RBS.

NRC Request 2(d)

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.

RBS Response to Request 2(d):

RBS does not use Hemyc or MT fire barrier material.

NRC Request 3

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

RBS Response to Request 3:

As no Hemyc or MT fire barrier material is installed at RBS and no corrective actions are required, RBS response to this request is not applicable.