

June 2, 2006

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

**Subject: Docket Nos. 50-361 and 50-362
Response to Generic Letter 2006-03
San Onofre Nuclear Generating Station, Units 2 and 3**

Dear Sir or Madam:

The enclosure provides Southern California Edison's (SCE's) response to Generic Letter (GL) 2006-03, Potentially Nonconforming Hemyc and MT Fire Barrier Configurations, issued April 10, 2006. GL 2006-03 requested licensees to provide the following information: 1.a) a statement on whether Hemyc or MT fire barrier material is used at their nuclear power plants, and 1.b) a description of the controls that were used to ensure that other fire barrier types used are capable of providing the necessary level of protection. For those plants that have installed Hemyc or MT fire barrier materials, responses to items 2 and 3 are also required.

GL 2006-03 requested that a response be provided within 60 days.

If you have any questions or require any additional information, please contact Mr. Jack Rainsberry at (949) 368-7420.

Sincerely,



Enclosure

cc: B. S. Mallett, Regional Administrator, NRC Region IV
N. Kalyanam, NRC Project Manager, San Onofre Units 2 and 3
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3

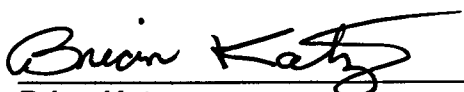
A125

June 2, 2006

In accordance with 10 CFR 50.54(f), the following affirmation is provided:

Brian Katz states that he is Vice President of Southern California Edison, is authorized to execute this oath on behalf of Southern California Edison and, to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,


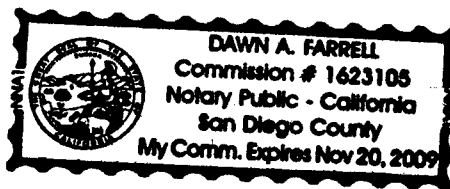


Brian Katz
Vice President
Southern California Edison

State of California
County of San Diego

Subscribed and sworn to (~~or affirmed~~) before me on this 2nd day of
June, 2006, by Brian Katz,

personally known to me to be the person who appeared before me.


Notary Public

ENCLOSURE

Generic Letter 2006-03 Response

NRC GENERIC LETTER 2006-03: POTENTIALLY NONCONFORMING HEMYC AND MT FIRE BARRIER CONFIGURATIONS

REQUESTED INFORMATION

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).

SCE RESPONSE:

Hemyc and MT material is not installed at San Onofre Nuclear Generating Station (SONGS) 2 and 3.

- 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.

SCE RESPONSE:

A description of the controls used to ensure that fire barrier types relied on for separation of redundant trains located within a single fire area are capable of providing the necessary level of protection requires a brief description of the SONGS Fire Protection Licensing Basis.

The NRC's acceptance of raceway fire barriers is described in the June 29, 1988, Safety Evaluation Report (SER) [Ref. 1]. NRC acceptance of SONGS raceway fire Barrier systems was based on various SCE submittals, the most important of which, dated May 31, 1987 [Ref. 2], included a deviation request to Appendix R and a technical basis for installed Cerablanket raceway fire barriers. The technical basis was slightly clarified in a November 20, 1987 letter [Ref. 3]. These submittals and the SER identify that the Cerablanket raceway fire barrier material did not meet all of the acceptance criteria delineated in the standard fire test and in the staff fire

protection guidelines in Generic Letter 86-10. These criteria included cold side temperature limits and hose stream test integrity.

NRC acceptance of the Cerablanket raceway fire barrier material was based on the existence of automatic fire detection and suppression systems in the areas in which the barrier material was installed, and the site fire department's ability to respond and initiate suppression activities. The SER concluded "that the deviations from BTP CMEB 9.5-1, associated with the barrier material, are not significant from a fire safety standpoint and are, therefore, acceptable."

After the issuance of the SER, design changes were initiated to upgrade the Cerablanket material to the 3M Interam fire barrier system. In the 1990's, SCE undertook an effort to ensure that all configurations of 3M system were bounded by fire tests. Cold side temperature limits and hose stream integrity were used to assess the adequacy of the raceway fire barriers. This analysis verified that the majority of raceway fire barriers were bounded by these fire testing criteria. The remaining raceway fire barriers were demonstrated to provide a fire resistance capability greater than the raceways described in SCE's submittal and the June 29, 1988 SER.

Controls are in place to ensure fire barrier material installation is consistent with the SONGS approved licensing bases.

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.

SCE RESPONSE:

Hemyc and MT material is not installed at SONGS 2 and 3.

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.

SCE RESPONSE:

Hemyc and MT material is not installed at SONGS 2 and 3.

REFERENCES

1. Donald E. Hickman (NRC) to Kenneth P. Baskin (SCE) letter dated June 29, 1988, Revision 1 to the Fire Hazards Analysis Evaluation for San Onofre Units 2 & 3
2. M. O. Medford (SCE) to Document Control Desk (NRC) letter dated May 31, 1987, Docket Nos. 50-361 and 50-362, San Onofre Nuclear Generating Station, Units 2 and 3
3. M. O. Medford (SCE) to Document Control Desk (NRC) letter dated November 20, 1987, Docket Nos. 50-361 and 51-362, San Onofre Nuclear Generating Station, Units 2 and 3.