



June 5, 2006  
RC-06-0106

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Dear Sir/Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
60-DAY RESPONSE TO NRC GENERIC LETTER 2006-03:  
POTENTIALLY NONCONFORMING HEMYC AND MT FIRE BARRIER  
CONFIGURATIONS

This letter provides South Carolina Electric & Gas Company's (SCE&G) 60-day response to the subject generic letter for V. C. Summer Nuclear Station (VCSNS). SCE&G responds to the requested information of Generic Letter (GL) 2006-03, as follows:

*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).*

Response: VCSNS does not use Hemyc or MT fire barrier material, it is not relied upon for separation and/or safe shutdown purposes, and it is not credited in any Station analyses (e.g., exemptions, license amendments, or GL 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.*

Response: All fire wraps are installed per the plant design control program with oversight from Design Engineering and Quality Assurance/Control to ensure only qualified materials are installed and only in approved configurations. These measures ensure wrapped electrical raceway or conduits are adequately protected and meet the separation requirements of Appendix R, Section III.G.2 (c) for redundant trains located in a single fire area.

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Previously, two (2) types of wraps were employed at VCSNS, Thermolag and Kaowool. These wraps were generally utilized for Appendix R separation, although Thermolag was also utilized in a non-electrical capacity for protection of certain structural supports.

In response to GL 92-08, Thermo-Lag 330-1 electrical barriers installed at the facility for Appendix R related circuits were eliminated. In one instance, the affected circuits were rerouted to meet Appendix R separation criteria. In the remaining applications, a deviation request was submitted and approved for the use of Rockbestos Firezone R Cable.

There are Kaowool configurations still being maintained at VCSNS to meet NRC Regulatory Guide 1.75 criteria for safety related cable separation not related to Appendix R separation and/or safe shutdown. Where it is relied upon for Appendix R separation and/or safe shutdown purposes, the use of Kaowool at VCSNS has been reevaluated. In some applications Kaowool was found to be acceptable, after modifications, in configurations determined by station supported testing of the product. In the remaining applications, Kaowool is being removed and replaced with 3M wrap in accordance with the plant design change process.

The 3M product, Interam wrap (E-54A Flexible Mat), is being utilized for the ongoing Kaowool replacement project at VCSNS. The 3M wrap is well tested as demonstrated by fire tests conducted in accordance with ASTM E-119. The 3M wrap is being installed to approved, tested configurations. Any deviations from the approved, tested configurations are being evaluated to GL 86-10 criteria on a case by case basis.

Should you have questions, please call Mr. Robert Sweet at (803) 345-4080.

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

6/5/06  
Executed on

David Smith for JA  
Jeffrey B. Archie  
Vice President, Nuclear Operations

MWD/JBA/mb  
Attachment

c:	K. B. Marsh	K. M. Sutton
	S. A. Byrne	NRC Resident Inspector
	N. S. Carns	NSRC
	J. H. Hamilton (w/o Attachment)	CER (C-06-1332)
	R. J. White	File (815.14)
	W. D. Travers	DMS (RC-06-0106)
	R. E. Martin	