



June 8, 2006

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

Serial No. 06-325  
NL&OS/GDM R0  
Docket Nos. 50-305  
50-336/423  
50-338/339  
50-280/281  
License Nos. DPR-43  
DPR-65/NPF-49  
NPF-4/7  
DPR-32/37

**DOMINION ENERGY KEWAUNEE, INC. (DEK)**  
**DOMINION NUCLEAR CONNECTICUT, INC. (DNC)**  
**VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)**  
**KEWAUNEE POWER STATION UNIT 1**  
**MILLSTONE POWER STATION UNITS 2 AND 3**  
**NORTH ANNA POWER STATION UNITS 1 AND 2**  
**SURRY POWER STATION UNITS 1 AND 2**  
**GENERIC LETTER 2006-03 POTENTIALLY NONCONFORMING HEMYC AND MT**  
**FIRE BARRIER CONFIGURATIONS**

On April 10, 2006, the NRC issued Generic Letter (GL) 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations." The GL requests licensees to: 1) determine whether Hemyc or MT fire barrier material is installed and relied upon at their stations for separation and/or safe shutdown purposes to satisfy applicable regulatory requirements, and 2) describe 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. Additional information was requested to be provided if it was determined that Hemyc or MT fire barriers are credited for compliance.

DEK, DNC and Dominion have reviewed GL 2006-03 and their combined response for the four subject stations is provided in the attachment. As noted in the attachment, neither Hemyc nor MT fire barrier configurations are used at Kewaunee, Millstone, North Anna or Surry Power Stations, and appropriate controls are in place to ensure that only approved fire barrier materials are used in fire protection applications at the plants.

If you have questions or require additional information, please contact Mr. Gary D. Miller at (804) 273-2771.

Sincerely,

E. S. Grecheck  
Vice President – Nuclear Support Services  
Dominion Energy Kewaunee, Inc.  
Dominion Nuclear Connecticut, Inc.  
Virginia Electric and Power Company

Attachment

Commitments made in this letter: None

cc: U.S. Nuclear Regulatory Commission  
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COMMONWEALTH OF VIRGINIA )  
  )  
COUNTY OF HENRICO )

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Eugene S. Grecheck, who is the Vice President – Nuclear Support Services of Virginia Electric and Power Company. He has affirmed before me that he is duly authorized to execute and file the forgoing document in behalf of that Company, and that the statements in the document are true and correct to the best of his knowledge, information, and belief.

Acknowledged before me this 8<sup>TH</sup> day of June, 2006.

My Commission Expires: May 31, 2010

Vicki L. Hule  
Notary Public

(SEAL)

**ATTACHMENT**

**RESPONSE TO GENERIC LETTER 2006-03**

**POTENTIALLY NONCONFORMING  
HEMYC AND MT FIRE BARRIER CONFIGURATIONS**

**Dominion Energy Kewaunee, Inc.  
Dominion Nuclear Connecticut, Inc.  
Virginia Electric and Power Company**

**Kewaunee Power Station Unit 1  
Millstone Power Station Units 2 and 3  
North Anna Power Station Units 1 and 2  
Surry Power Station Units 1 and 2**

**60-Day Response to Generic Letter 2006-03**  
**Potentially Nonconforming Hemyc and Mt Fire Barrier Configurations**

**Kewaunee Power Station Unit 1, Millstone Power Station Units 2 and 3**  
**North Anna and Surry Power Stations Units 1 and 2**

Generic Letter (GL) 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations requests licensees to: 1) determine within 60 days of the date of the GL whether Hemyc or MT fire barrier material is installed and relied upon for separation and/or safe shutdown purposes to satisfy applicable regulatory requirements, and 2) describe the controls that were used to ensure the adequacy of other fire barrier types, consistent with the assessment requested in GL 92-08. Additional information was requested to be provided if it was determined that Hemyc or MT is credited for compliance. The specific NRC questions are provided below as well as responses for Kewaunee, Millstone, North Anna and Surry Power Stations.

NRC Question 1

*Within 60 days of the date of this GL, provide the following information:*

- a. A statement on whether Hemyc or MT fire barrier material is used in 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

Neither Hemyc nor MT fire barrier material is used at Kewaunee, Millstone, North Anna or Surry Power Stations for separation and/or safe shutdown purposes. This determination has been confirmed through the review of procurement records. Also, these fire barrier materials are not credited in the current licensing basis (i.e., NRC Safety Evaluation Reports associated with the station fire protection programs, station fire hazard and Appendix R analyses, Branch Technical Position 9.5.1) or other analyses (e.g. exemptions, license amendments, GL 86-10 engineering evaluations, etc.)

- 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 response to GL 92-08 to the extent that the responses address this specific issue.*

### Response

To ensure that other fire barrier types that are relied upon for separation of redundant trains are capable of providing the necessary level of protection, the following procedures and/or processes have been previously established for Kewaunee, Millstone, North Anna and Surry Power Stations:

- a) Station procedures require post-installation (i.e. new, repair) inspections of credited fire barriers to ensure compliance with approved configurations.
- b) The stations' design control programs/procedures include a requirement for the design of new fire barriers to be reviewed by station fire protection engineers to ensure compliance with the current licensing basis and approval by a known testing laboratory [e.g., Underwriters Laboratory (UL), Factory Mutual (FM)].
- c) Procurement specification requirements for fire barriers are reviewed by fire protection engineers to ensure compliance with the current licensing basis and approval by a known testing laboratory (e.g., UL, FM).

### NRC Question 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.*

Response

NRC Question 2 is not applicable to Kewaunee, Millstone, North Anna or Surry Power Stations since these four stations do not use Hemyc or MT fire barrier materials.

NRC Question 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.*

Response

NRC Question 3 is not applicable to Kewaunee, Millstone, North Anna or Surry Power Stations since these four stations do not use Hemyc or MT fire barrier materials.