



June 8, 2006

L-HU-06-025
10 CFR 50.54(f)

U.S. Nuclear Regulatory Commission
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Prairie Island Nuclear Generating Plant
Units 1 and 2
Dockets 50-282 and 50-306
License Nos. DPR-40 and DPR-60

Point Beach Nuclear Plant
Units 1 and 2
Dockets 50-266 and 50-301
License Nos. DPR-24 and DPR-27

Monticello Nuclear Generating Plant
Docket 50-263
License No. DPR-22

Palisades Nuclear Plant
Docket 50-255
License No. DPR-20

Response to Generic Letter 2006-03: Potentially Nonconforming Hemyc and MT Fire Barrier Configurations

Reference: 1) Generic Letter 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations," dated April 10, 2006.

In accordance with the requirements of 10 CFR 50.54(f), the Nuclear Management Company, LLC provides enclosures 1 through 4 in response to Generic Letter 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations," (Reference 1) for each nuclear unit for which NMC holds the operating license.

This letter contains no new commitments and no revisions to existing commitments. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 8, 2006.

Edward J. Weinkam
Director, Nuclear Licensing and Regulatory Services
Nuclear Management Company, LLC

cc: Administrator, Region III, USNRC

Enclosures (4)

ENCLOSURE 1

RESPONSE TO GENERIC LETTER 2006-03

As stated within the Requested Actions section of Generic Letter 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations," dated April 10, 2006, addressees are requested to provide within 60 days a determination of whether or not Hemyc or MT fire barrier material are installed and relied upon for separation and/or safe shutdown purposes to satisfy applicable regulatory requirements. Addressees that credit Hemyc or MT for compliance were requested in Generic Letter 2006-03 to provide further additional information.

The Nuclear Management Company, LLC (NMC) has determined that none of the nuclear units in the NMC fleet, as listed below, utilize Hemyc or MT fire barrier materials for separation and/or safe shutdown purposes.

- Monticello Nuclear Generating Plant
- Palisades Nuclear Plant
- Point Beach Nuclear Plant, Units 1 and 2
- Prairie Island Nuclear Generating Plant, Units 1 and 2

Licensees were also requested to describe the controls to ensure the adequacy of other fire barrier types, consistent with the assessment requested in Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers." Enclosures 2 through 4 summarize the controls used to ensure the adequacy of other fire barrier types at each of the NMC nuclear units listed above.

The Requested Information section of Generic Letter 2006-03, requests addresses to provide the following information (shown in bold below):

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).**

Neither Hemyc nor MT fire barrier material is used for compliance with separation and/or safe shutdown requirements for 10 CFR 50, Appendix R or the fire protection program licensing basis at the nuclear units in the NMC fleet.

ENCLOSURE 1

RESPONSE TO GENERIC LETTER 2006-03

- 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.**

Enclosures 2 through 4 summarize the controls at each NMC unit to ensure that the fire barrier types (if utilized) relied on for separation of redundant trains located in a single fire area provide the necessary level of protection. The fire barrier materials used at each NMC unit to provide protection and separation are:

- Palisades Nuclear Plant encased a conduit and pull box in concrete. (See Enclosure 2)
- Point Beach Nuclear Plant, Units 1 and 2, uses 3M Interam E50 Series material. (See Enclosure 3)
- Prairie Island Nuclear Generating Plant, Units 1 and 2, uses Darmatt and 3M Interam E50 Series material. (See Enclosure 4)

The Monticello Nuclear Generating Plant does not utilize fire barrier materials to achieve separation of redundant trains located in a single fire area.

- 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),**

This question is not applicable to the NMC nuclear plants due to the response to question 1.a above.

- 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,**

This question is not applicable to the NMC nuclear plants due to the response to question 1.a above.

ENCLOSURE 1

RESPONSE TO GENERIC LETTER 2006-03

- 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**

This question is not applicable to the NMC nuclear plants due to the response to question 1.a above.

- 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.**

This question is not applicable to the NMC nuclear plants due to the response to question 1.a above.

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.**

This question is not applicable to the NMC nuclear plants due to the response to question 1.a above.

ENCLOSURE 2

PALISADES RESPONSE TO QUESTION 1.B OF GENERIC LETTER 2006-03

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.

The Palisades Nuclear Plant (PNP) does not use Hemyc or MT fire barrier materials as part of the fire protection program to protect electrical raceways for fire safe shutdown compliance purposes.

As credited within the safe shutdown analysis, a one-hour fire barrier to separate redundant trains within the same fire area was constructed by enclosing a conduit and pullbox within concrete. Since the fire barrier material is concrete the one-hour fire rating was determined by analysis and is documented in the PNP response to Generic Letter 92-08.

The concrete used in this application provides an acceptable one-hour fire rated barrier that meets the separation criteria of Section III.G.2.c of Appendix R to 10 CFR 50.

ENCLOSURE 3

POINT BEACH UNITS 1 AND 2 RESPONSE TO QUESTION 1.B OF GENERIC LETTER 2006-03

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.

The Point Beach Nuclear Plant (PBNP), Units 1 and 2, does not use Hemyc or MT fire barrier materials as part of the fire protection program to protect electrical raceways for fire safe shutdown compliance purposes. The 3M Interam E-50 Series fire barrier material is credited as the electrical raceway fire barrier system in the safe shutdown analysis.

The 3M Interam E-50 Series fire barrier systems installed prior to Generic Letter 86-10, Supplement 1, have been qualified for a one-hour fire rating in accordance with the recognized fire test standards available at the time of installation and as documented in the PBNP response to Generic Letter 92-08.

The 3M Interam E-50 Series fire barrier systems installed subsequent to Generic Letter 86-10, Supplement 1, have been qualified to a one-hour fire rating, which included the criteria of Generic Letter 86-10, Supplement 1.

The 3M Interam E-50 Series material was installed in accordance with reviewed and approved installation procedures and configurations. Acceptability of a limited number of specific configurations of the material installed as electrical raceway fire barrier systems was evaluated in fire protection engineering evaluations prepared in accordance with the guidance of Generic Letter 86-10.

The 3M Interam E-50 Series material fire barrier system provides an acceptable one-hour fire rated barrier that meets the separation criteria of Section III.G.2.c of Appendix R to 10 CFR 50.

ENCLOSURE 4

PRAIRIE ISLAND UNITS 1 AND 2 RESPONSE TO QUESTION 1.B OF GENERIC LETTER 2006-03

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.

The Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, does not use Hemyc or MT fire barrier materials as part of the fire protection program to protect electrical raceways for fire safe shutdown compliance purposes.

The Darmatt KM1 (manufactured by Darchem Engineering Ltd.) and 3M Interam E50 Series fire barrier materials are credited as the electrical raceway fire barrier systems in the safe shutdown analysis. These fire barrier systems have been qualified for a one-hour fire rating in accordance with the requirements of Generic Letter 86-10, Supplement 1.

The Darmatt and the 3M Interam E50 Series material were installed in accordance with reviewed and approved installation procedures and configurations. The acceptability of a limited number of specific configurations of the materials installed as electrical raceway fire barrier systems were evaluated in fire protection engineering evaluations in accordance with the requirements of Generic Letter 86-10.

The Darmatt and 3M Interam E50 Series material fire barrier systems provide an acceptable one-hour fire rated barrier that meets the separation criteria of Section III.G.2.c of Appendix R to 10 CFR 50.