

L. M. Stinson (Mike)
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Energy to Serve Your WorldSM

June 9, 2006

Docket Nos.: 50-348 50-321 50-424
50-364 50-366 50-425

NL-06-1042

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

Joseph M. Farley Nuclear Plant
Edwin I. Hatch Nuclear Plant
Vogtle Electric Generating Plant
NRC Generic Letter 2006-03 Response

Ladies and Gentlemen:

Southern Nuclear Operating Company (SNC), the licensed operator for the Edwin I. Hatch Nuclear Plant, the Joseph M. Farley Nuclear Plant and the Vogtle Electric Generating Plant, received NRC Generic Letter 2006-03: Potentially Nonconforming Hemyc and MT Fire Barrier Configurations, dated April 10, 2006.

In accordance with 10 CFR 50.54(f), SNC hereby submits its response.

Mr. L. M. Stinson states he is a Vice President of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of his knowledge and belief, the facts set forth in this letter are true.

This letter contains no NRC commitments. If you have any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

A handwritten signature in black ink that reads "L. M. Stinson".

L. M. Stinson

L. M. Stinson

A circular notary seal for Valerie A. O'Brien, Notary Public, located to the left of the signature.

Sworn to and subscribed before me this 9 day of June, 2006.

A handwritten signature in black ink that reads "Valerie A. O'Brien".

Valerie A. O'Brien
Notary Public

My commission expires: 4-28-07

LMS/JLS/sdl

- Enclosures: 1. GL 2006-03 Response - Farley Nuclear Plant
2. GL 2006-03 Response - Hatch Nuclear Plant
3. GL 2006-03 Response - Vogtle Electric Generating Plant

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President (w/o Enclosures)
Mr. H. L. Sumner, Jr., Vice President – Plant Farley (w/o Enclosures)
Mr. D. E. Grissette, Vice President – Plant Vogtle (w/o Enclosures)
Mr. J. R. Johnson, General Manager – Plant Farley
Mr. D. R. Madison, General Manager – Plant Hatch
Mr. T. E. Tynan, General Manager – Plant Vogtle
RType: CFA04.054; LC# 14437

U. S. Nuclear Regulatory Commission
Dr. W. D. Travers, Regional Administrator
Mr. R. E. Martin, NRR Project Manager – Farley
Mr. C. Gratton, NRR Project Manager – Hatch
Mr. C. Gratton, NRR Project Manager – Vogtle
Mr. C. A. Patterson, Senior Resident Inspector – Farley
Mr. D. S. Simpkins, Senior Resident Inspector – Hatch
Mr. G. J. McCoy, Senior Resident Inspector – Vogtle

Enclosure 1

GL 2006-03 Response - Farley Nuclear Plant

Enclosure I
GL 2006-03 Response - Farley Nuclear Plant

GL 2006-03: Potentially Nonconforming Hemyc and MT Fire Barrier Configurations

GL 2006-03 contained the following information requests:

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).
 - 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.

SNC Response:

Information Request Item 1a:

Farley Nuclear Plant (FNP) does not have any Hemyc or MT fire barrier material installed on site.

Information Request Item 1b:

By December 2006, FNP is scheduled to complete modifications that eliminate FNP's reliance on Kaowool as a raceway fire barrier material. The Kaowool reliance elimination for the Service Water Intake Structure (SWIS) has been approved by the NRC in a Safety Evaluation Report (SER) provided in letter dated August 16, 2005. Part of this Kaowool reliance elimination is accomplished by the use of Meggitt fire-rated cable, which has been approved for use at FNP as documented in NRC SERs provided in letters dated February 13, 2006 and March 22, 2006. The Meggitt fire-rated cable was tested as documented in the Meggitt Report, "Appendix R, 1-hour Fire Resistive Control Cable Test."

Where cable tray enclosures are required for separation of redundant trains located in a single fire area, enclosures have been constructed using Promat-H board. Penetrations of the stairwell cable tray enclosures are protected using 3M Interam E-50 Series wrap materials and/or 45B formulated silicone elastomer.

Promat-H is a material tested in accordance with UL Standard 263, "Fire Tests of Building Construction and Materials," which references ASTM E119 "Standard Test Method for Fire Tests of Building Construction and Materials" and NFPA 251 "Standard Methods of Tests of Fire Resistance of Building Construction and

Material” tests. The 3M Interam E-50 wrap has been tested in accordance with GL 86-10, Supplement 1 “Fire Endurance Test Acceptance Criteria for Fire Barrier Systems used to Separate Redundant Safe Shutdown Trains Within the Same Fire Area,” while the 45B formulated silicone elastomer has been tested in accordance with test conditions prescribed by ASTM E119. These tests show that the configurations used at FNP are capable of providing the necessary level of protection.

Enclosure 2

GL 2006-03 Response - Hatch Nuclear Plant

Enclosure 2
GL 2006-03 Response - Hatch Nuclear Plant

GL 2006-03: Potentially Nonconforming Hemyc and MT Fire Barrier Configurations

GL 2006-03 contained the following information requests:

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).
 - 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.

SNC Response:

Information Request Item 1a:

Hatch Nuclear Plant (HNP) does not have any Hemyc or MT installed on site.

Information Request Item 1b:

Where cable tray enclosures are required for separation of redundant trains located in a single fire area, enclosures have been constructed using Promat-H board. Promat-H is a material tested in accordance with UL Standard 263, "Fire Tests of Building Construction and Materials," which references ASTM E119 "Standard Test Method for Fire Tests of Building Construction and Materials" and NFPA 251 "Standard Methods of Tests of Fire Resistance of Building Construction and Material" tests.

Enclosure 3

GL 2006-03 Response - Vogtle Electric Generating Plant

Enclosure 3
GL 2006-03 Response - Vogtle Electric Generating Plant

GL 2006-03: Potentially Nonconforming Hemyc and MT Fire Barrier Configurations

GL 2006-03 contained the following information requests:

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).
 - 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.

SNC Response:

Information Request Item 1a:

Vogtle Electric Generating Plant (VEGP) does not have any Hemyc or MT installed on site.

Information Request Item 1b:

Electrical raceway fire barrier protection is constructed using the following materials:

- 3M Interam E53C, E54A and E54C are used for three-hour rated electrical raceway fire barrier systems. These materials have been tested in accordance with GL 86-10, Supplement 1 "Fire Endurance Test Acceptance Criteria for Fire Barrier Systems Used to Separate Redundant Safe Shutdown Trains within the Same Fire Area" (Omega Point Laboratory CTP-2005, 14540-99416; Vogtle Document AX3AJ08-00001).
- Additional barriers have been constructed in the form of three-hour rated non-bearing walls using concrete block (UL Letter November 7, 1995 Ref. R4339/95NK30659) and three-hour non-bearing gypsum wall, UL design number U606 with sheet metal coverings.
- Some conduits and junction boxes are protected with cementitious spray-applied fire resistant coatings per UL designs Y707 and Y708. In each case, the masonry unit assemblies, composite assemblies of structural materials, and spray applied coatings were tested in accordance with UL

Standard 263, "Fire Tests of Building Construction and Materials," which references ASTM E119 "Standard Test Method for Fire Tests of Building Construction and Materials" and NFPA 251 "Standard Methods of Tests of Fire Resistance of Building Construction and Material" tests.