



Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
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Site Vice President

June 6, 2006

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

SUBJECT: Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
Docket No: 50-293
License No: DPR-35

Response to NRC Generic Letter 2006-03, "Potentially Nonconforming
Hemyc and MT Fire Barrier Configurations"

REFERENCE: NRC Generic Letter 2006-03, dated April 10, 2006, "Potentially
Nonconforming Hemyc and MT Fire Barrier Configurations"

LETTER NUMBER: 2.06.050

Dear Sir or Madam:

The NRC issued Generic Letter (GL) 2006-03 to request facilities to confirm compliance with existing applicable regulatory requirements, and if appropriate, take additional actions. Specifically, although Heymc and MT fire barriers may be relied on to protect electrical and instrumentation cables and equipment that provide safe shutdown capability during a fire, 2005 NRC testing has revealed that both materials failed to provide the protective function intended for compliance with existing regulations.

The Pilgrim Nuclear Power Station (PNPS) response to the requested information in GL 2006-03 is contained in the attachment to this submittal.

There are no commitments contained in this letter.

If you have any questions or require additional information, please contact Bryan Ford at (508) 830-8403.

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

Executed on the 6 th of June 2006.

Sincerely,

Michael A. Balduzzi

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Attachments 1. PNPS Response to NRC GL 2006-03 (3 pages).

cc: Mr. James Shea, Project Manager
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Pilgrim Nuclear Power Station
Response to NRC Generic Letter 2006-03

NRC Requested actions:

Within 60 days of the date of this letter, all addressees are requested to determine whether or not Hymec or MT fire barrier material is installed and relied upon for separation and/or safe shutdown purposes to satisfy applicable regulatory requirements. In addition licensees are asked to describe controls that were used to ensure the adequacy of other barrier types, consistent with the assessment requested in GL 92-08.

Addressees that credit Hymec or MT for compliance are requested to provide information regarding the extent of installation, whether the material complies with regulatory requirements, and any compensatory actions in place to provide equivalent protection and maintain safe shutdown function of affected areas of the plant in light of the recent findings associated with Hymec and MT. Licensees are requested to provide evaluations to support conclusions that they are in compliance with regulatory requirements for the Hymec and MT applications. Licensees that cannot justify their continued reliance on Hymec or MT are requested to provide a description of corrective actions taken or planned and a schedule for milestones, including when full compliance will be achieved.

Compensatory measures and corrective actions must be implemented in accordance with existing regulations commensurate with the safety significance of the nonconforming condition. The NRC expects all licensees to fully restore compliance with 10CFR50.48 and submit the required documentation to the NRC by December 1, 2007

NRC Request 1(a)

Provide a statement on whether Hymec or MT fire barrier material is used and whether it is relied upon for separation and/or safe shutdown purposes in accordance with the licensing basis, including whether Hymec or MT is credited in other analyses (e.g., exemptions, license amendments, GL 86-10 analyses).

PNPS Response to Request 1(a):

Hymec or MT fire barrier material is not installed at Pilgrim Nuclear Power Station (PNPS); therefore, PNPS does not rely on either Hymec or MT for separation and/or safe shutdown purposes to meet 10CFR50 Appendix R requirements.

NRC Request 1(b)

Provide 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.

PNPS Response to Request 1(b):

PNPS credits Mecatiss and 3M Interam[®] type raceway fire barriers for protection of electrical and instrumentation cables associated with equipment that provides 10 CFR 50, Appendix R safe shutdown capability for specific fire areas. These raceway fire barriers were installed in accordance with the controls imposed by the PNPS design change process and were evaluated to ensure that the necessary level of fire protection was provided to demonstrate 10 CFR 50,

Appendix R, Section III.G.2.a and c compliance. The raceway fire barrier installations were installed subsequent to issuance of NRC Generic Letter 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," dated March 15, 1994 and NRC Information Notice 95-52, "Fire Endurance Test Results for Electrical Raceway Fire Barrier Systems Constructed from 3M Company Interam[®] Fire Barrier Materials," dated November 14, 1995. These raceway fire barrier configurations were evaluated using the acceptance criteria identified in Generic Letter 86-10, Supplement 1, and as applicable, addressed the concerns noted in Information Notice 95-52.

NRC Request 2(a)

For those addressees that have installed Hemyc or MT fire barrier materials, discuss the extent of the installation (e.g., linear feet of wrap, areas installed, systems protected).

PNPS Response to Request 2(a):

Hemyc or MT fire barrier material is not installed at PNPS.

NRC Request 2(b)

For those addressees that have installed Hemyc or MT fire barrier materials, discuss 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.

PNPS Response to Request 2(b):

Hemyc or MT fire barrier material is not installed at PNPS.

NRC Request 2(c)

For those addressees that have installed Hemyc or MT fire barrier materials, 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 addresses' conclusions..

PNPS Response to Request 2(c):

Hemyc or MT fire barrier material is not installed at PNPS.

NRC Request 2(d)

For those addressees that have installed Hemyc or MT fire barrier materials, provide 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.

PNPS Response to Request 2(d):

Hemyc or MT fire barrier material is not installed at PNPS.

NRC Request 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.

PNPS Response to Request 3:

Hemyc or MT fire barrier material is not installed at PNPS; therefore, no corrective actions are required.