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June 7, 2006

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

Subject: Duke Power Company LLC d/b/a Duke Energy Carolinas, LLC
Oconee Nuclear Station, Units 1, 2, and 3
Docket Nos. 50-269, 50-270, 50-287
McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369, 50-370
Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413, 50-414
Response to NRC Generic Letter 2006-03, Potentially
Nonconforming Hemyc and MT Fire Barrier Configurations

Pursuant to 10 CFR 50.54(f), this letter and associated attached Enclosures provide Duke Energy Carolinas (Duke) 60 day response to NRC Generic Letter 2006-03. Responses are provided for Generic Letter items 1.a through 3 in Enclosures I, II and III for Catawba, McGuire and Oconee, respectively

This correspondence contains no regulatory commitments.

If any questions arise or additional information is needed, please contact Greg Kent at (980) 373-6032.

Very truly yours,

Henry B. Barron

Enclosures

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xc:

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Henry B. Barron affirms that he is the person who subscribed his name to the foregoing statement, and that all the matters and facts set forth herein are true and correct to the best of his knowledge.

Henry B Barron

Henry B. Barron

Subscribed and sworn to me:

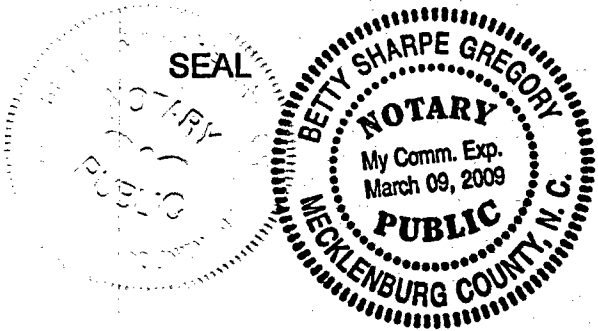
June 7, 2006
Date

Betty Sharpe Gregory

Notary Public

My Commission Expires:

March 9, 2009
Date



Enclosure I

Catawba Nuclear Station

NRC GL 2006-03 REQUESTED INFORMATION

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Catawba Nuclear Station
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1. Within 60 days of the date of this GL, provide the following:

1a. 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).

Hemyc fire barrier material is used at Catawba Nuclear Station (Catawba) as a 1-hour rated electrical raceway fire barrier system (ERFBS) and is credited for separation of safe shutdown cables in a single fire area. Catawba does not use MT fire barrier material.

1b. 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.

Catawba does not use any other material as a fire barrier for separation of redundant trains located in a single fire area.

NOTE: Duke understands this question to be applicable to electrical raceway fire barrier systems (ERFBS) consistent with this Generic Letter (GL) and GL 92-08 dealing with Thermo-Lag fire barriers.

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:

2a. The extent of the installation (e.g., linear feet of wrap, areas installed, systems protected).

Hemyc is currently installed at Catawba in the Unit 1 and Unit 2 Auxiliary Feedwater (AFW) Pump Rooms. The Hemyc is used to wrap approximately 300 linear feet in the Unit 1 AFW Pump Room and approximately 300 linear feet in the Unit 2 AFW Pump Room. The Hemyc is installed on select cable trays as well as some individual cable bundles. The Hemyc is credited to protect cables associated with the Turbine Driven Auxiliary Feedwater (AFW) Pump as used with the alternative shutdown capability (Standby Shutdown System).

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Catawba Nuclear Station
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2b. 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,

In light of recent testing by the NRC and the industry, Catawba is in agreement that the Hemyc fire wrap does not meet the 1-hour fire rating and Catawba is therefore, not in compliance with its licensing basis.

2c. 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

In response to the NRC Information Notice (IN) 2005-07 issued April 1, 2005, Catawba evaluated the Hemyc fire barrier and concluded that the Hemyc fire wrap does not meet the required 1-hour fire rating. As a result, the following compensatory measures were implemented in 2005:

- Establishing additional controls on the introduction of transient combustible/flammable materials into the affected fire areas.
- Adding a requirement to establish continuous firewatches in the affected fire areas whenever any of the three trains of the Auxiliary Feedwater System is unavailable during a required mode.

A fire hazards evaluation and a Fire Probabilistic Risk Assessment (PRA) were performed in support of the development of the above listed compensatory measures in accordance with NRC Regulatory Issue Summary (RIS) 2005-07.

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2d. 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.

On February 28, 2005, Duke submitted to the NRC a letter of intent to transition the Catawba Fire Protection Licensing Basis to NFPA 805 Performance Based Standard for Fire Protection in accordance with 10CFR50.48(c). Catawba expects to bring the Hemyc issue into full compliance through the transition process. Any required changes will be entered into the corrective action program. The NFPA 805 transition is scheduled to start in 2007 and to be completed in 2010. The compensatory measures discussed in the response to question 2c will remain in place until final disposition of the Hemyc issue during the NFPA 805 transition process.

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.

As noted in the response to Question 2d, Catawba plans to transition to NFPA 805. The transition process and schedule will extend past December 1, 2007. Catawba expects to bring the Hemyc issue into full compliance with the licensing basis through the NFPA 805 transition process.

Enclosure II

McGuire Nuclear Station

NRC GL 2006-03 REQUESTED INFORMATION

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McGuire Nuclear Station
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1. Within 60 days of the date of this GL, provide the following:

1a. 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).

Hemyc fire barrier material is used at McGuire Nuclear Station (McGuire) as a 1-hour rated electrical raceway fire barrier system (ERFBS) and is credited for separation of safe shutdown cables in a single fire area. McGuire does not use the MT fire barrier material.

1b. 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.

McGuire also utilizes fire resistive electrical cable manufactured by Meggitt Safety Systems (previously known as Whittaker Electronic Systems) for several "A" train cables that run through the Unit 1 "B" train Switchgear Room (Fire Area 11). This electrical cable, also known as MI cable, was used as a replacement for Thermo-lag.

By letter dated October 3, 2002 and supplemented on November 21, 2002, McGuire submitted a 10 CFR 50 Appendix R Deviation Request to the NRC consistent with the guidance in NRC Generic Letter 86-10. The Deviation Request contained the three hour qualification testing program and results performed by Whittaker Electronic Systems. The NRC reviewed the MI cable testing program and results and provided the approval of McGuire's Appendix R Deviation in the Safety Evaluation dated January 13, 2003.

Other than the above discussed MI cable, McGuire does not use any other material as an electrical raceway (ERFBS) fire barrier for separation of redundant trains located in a single fire area.

NOTE: Duke understands this question to be applicable to ERFBS consistent with this Generic Letter (GL) and GL 92-08 dealing with Thermo-Lag fire barriers.

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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:

2a. The extent of the installation (e.g., linear feet of wrap, areas installed, systems protected).

Approximately 64 linear feet of Hemyc is currently installed at McGuire in the Unit 1 and Unit 2 turbine driven Auxiliary Feedwater (AFW) system pump rooms.

For the Unit 1 turbine driven AFW pump room, approximately 20 linear feet of Hemyc is used as an Appendix R III.G.2.c fire barrier protecting the 'B' train cables associated with the Residual Heat Removal (RHR) system, the Chemical and Volume Control System (CVCS), the Nuclear Service Water (NSW) system, and 125VDC control power to an Essential Load Center (loss could only occur on a high impedance fault). The Hemyc is installed on a cable tray.

For the Unit 2 turbine driven AFW pump room, approximately 44 linear feet of Hemyc is used as an Appendix R III.G.2.c fire barrier protecting the 'B' train cables associated with the RHR system, the CVCS system, the AFW system, the Component Cooling Water (CCW) system, the NSW system, and 125VDC control power to an Essential Load Center (loss could only occur on a high impedance fault). The Hemyc is installed on select cable trays as well as some individual cable bundles.

2b. 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,

In light of recent testing by the NRC and the industry, McGuire is in agreement that the Hemyc fire wrap does not meet the 1-hour fire rating and McGuire is therefore, not in compliance with its licensing basis.

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2c. 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

In response to the NRC Information Notice (IN) 2005-07 issued April 1, 2005, McGuire evaluated the Hemyc fire barrier and concluded that the Hemyc fire wrap does not meet the required 1-hour fire rating. As a result, the following compensatory measures were implemented in 2005:

- Establishing additional controls on the introduction of transient combustible/flammable materials into the affected fire areas.
- Performing fire watches in the affected areas during routine Operator rounds.

A fire hazards evaluation and a Fire Probabilistic Risk Assessment (PRA) were performed in support of the development of the above listed compensatory measures in accordance with NRC Regulatory Issue Summary (RIS) 2005-07.

2d. 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.

On April 18, 2006, McGuire submitted to the NRC a letter of intent to transition to NFPA 805 Performance Based Standard for Fire Protection in accordance with 10 CFR 50.48(c). McGuire expects to bring the Hemyc issue into full compliance with the licensing basis through the transition process. Any required changes will be entered into the corrective action program. McGuire expects to submit the NFPA 805 license amendment request to the NRC prior to December 31, 2008. The compensatory measures discussed in the response to Question 2c will remain in place until final disposition of the Hemyc issue during the NFPA 805 transition process.

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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.

As noted in the response to Question 2d, McGuire plans to transition to NFPA 805. The transition process and schedule will extend past December 1, 2007. McGuire expects to bring the Hemyc issue into full compliance with the licensing basis through the NFPA 805 transition process.

Enclosure III

Oconee Nuclear Station

NRC GL 2006-03 REQUESTED INFORMATION

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Oconee Nuclear Station
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1. Within 60 days of the date of this GL, provide the following:

1a. 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).

Oconee Nuclear Station (Oconee) does not use MT Wrap as a fire barrier material.

Oconee does have Hemyc installed in the station. However, the three Hemyc applications at ONS are not relied upon for separation and/or safe shutdown purposes in accordance with the licensing basis. Hemyc has not been credited in any exemptions, license amendments, or analyses.

1b. 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.

Oconee does not currently use any ERFBS to separate trains within the same fire area.

Recently during the Oconee Appendix R reconstitution validation effort several locations were discovered that contained both shutdown trains in the same area. These discrepancies have been entered into the site corrective action program. Fire impairment surveillances are being performed in these areas until such time as the cables can comply with 10CFR50 Appendix R Section III.G or they can be dispositioned per the Oconee fire protection licensing basis transition to 10CFR50.48(c).

NOTE: Duke understands this question to be applicable to electrical raceway fire barrier systems (ERFBS) consistent with this Generic Letter (GL) and GL 92-08 dealing with Thermo-Lag fire barriers.

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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:

2a. The extent of the installation (e.g., linear feet of wrap, areas installed, systems protected),

Oconee currently uses a total of approximately 35 sq. ft. of Hemyc material in the form of blanket pads covering wall penetration seals. There are 3 penetrations (1 per unit) in the wall separating the Turbine and Auxiliary building where a Hemyc blanket pad is applied. The equipment identification numbers for the penetration seals that use Hemyc blanket pads are ON1FPSPN1TG0043 (approximately 14 sq. ft.), ON2FPSPN2TG0076 (approximately 14 sq. ft.), and ON3FPSPN3TG0063 (approximately 7 sq. ft.). The application is not credited towards the penetration seal's 3-hour fire rating as required to meet licensing basis protection requirements. The penetration seal on each unit is comprised of a steel plate covering an opening in the 3-hour fire rated concrete block wall. This steel plate is used as a bulkhead to transition the instrument tubing from the Turbine Building into the Cable Spread Room of the Auxiliary Building at an elevation of approximately 813 feet. The steel plate overlaps the opening size on the turbine building side. Prior to installation of the Hemyc, this penetration was deemed acceptable and equivalent to a 3-hour rated assembly due to a low combustible loading proximate to the penetration. This evaluation is documented in a GL 86-10 engineering equivalency evaluation. The Hemyc blanket pad was installed over the penetration seal on the Turbine Building side to provide additional thermal margin.

2b. 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,

Hemyc blanket pads are not used to support the Oconee fire barrier licensing basis.

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2c. 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

There are no compensatory measures in place in response to the findings of the Hemyc tests. Compensatory measures are not required because the penetrations identified above are in full compliance with fire protection regulations and Oconee licensing basis with or without the use of Hemyc. The use of Hemyc at Oconee was an elective, conservative measure taken to provide additional margin in protection for the specific fire barrier penetrations identified above. The additional margin was not required by the Oconee license or by the fire protection regulations.

2d. 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.

Not applicable to Oconee.

- 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.**

Not applicable to Oconee.