



# Progress Energy

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**JUN 06 2006**

**SERIAL: BSEP 06-0049**

**10 CFR 50.54(f)**

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

**Subject: Brunswick Steam Electric Plant, Unit Nos. 1 and 2  
Docket Nos. 50-325 and 50-324/License Nos. DPR-71 and DPR-62  
Response to Generic Letter 2006-03, Potentially Nonconforming Hemyc  
and MT Fire Barrier Configurations**

**Ladies and Gentlemen:**

On April 10, 2006, the NRC issued Generic Letter 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations." Responses to Generic Letter 2006-03 were required to be submitted within 60 days of the date of the letter (i.e., June 9, 2006).

The requested information is enclosed. No regulatory commitments are contained in this letter. Please refer any questions regarding this submittal to Mr. Leonard R. Beller, Supervisor - Licensing/Regulatory Programs, at (910) 457-2073.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on June 6, 2006.

Sincerely,

**James Scarola**

WRM/wrm

**Enclosure: Response to Generic Letter 2006-03**

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Response to Generic Letter 2006-03

On April 10, 2006, the NRC issued Generic Letter 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations." Responses to Generic Letter 2006-03 were required to be submitted within 60 days of the date of the letter (i.e., June 9, 2006). Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., is providing responses below to the requested information for the Brunswick Steam Electric Plant (BSEP), Units 1 and 2.

The requested information follows.

NRC Request 1 Topic

Within 60 days of the date of Generic Letter 2006-03 (i.e., June 9, 2006), the NRC requested responses to the following questions.

Request 1.a

A statement on whether Hemyc or MT fire barrier material is used at their NPPs and whether it is relied upon 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 to Request 1.a

Hemyc or MT fire barrier material has not been installed at the BSEP, Units 1 and 2.

Request 1.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 Request 1.b

BSEP uses Kaowool, as part of the approved Appendix A Fire Protection Program and Appendix R exemption basis. The Kaowool material is not credited as a one-hour or three-hour barrier as required by 10 CFR 50, Appendix R, but does provide additional fire protection defense-in-depth.

There are other instances in which 3M Interam E50A and E54A fire barrier materials are installed for separation and/or safe shutdown purposes. The 3M Interam E50A and E54A fire

barrier materials used for separation of redundant trains have been installed in accordance with the manufacturer's instructions to provide the required fire resistance rating. The materials used have been tested by independent testing laboratories in accordance with national standards.

At BSEP, fire barrier installations are inspected at an established frequency in accordance with station procedures to ensure the installations are intact. Design controls at BSEP ensure the review and approval of new fire barrier installations or modification of existing fire barriers.

**NRC Request 2 Topic**

Within 60 days of the date of Generic Letter 2006-03, the NRC requests discussion of installation details for Hemyc or MT fire barrier materials from those addressees that have installed these materials.

**Response to Request 2**

As stated in the response to Request 1.a, Hemyc or MT fire barrier material has not been installed in the BSEP, Units 1 and 2, for separation and/or safe shutdown purposes. Therefore, this question is not applicable to BSEP, Units 1 and 2.

**NRC Request 3 Topic**

No later than December 1, 2007, addressees that identified in 1.a Hemyc or MT configurations were requested to provide a description of actions taken to resolve the nonconforming conditions described in Request 2.d.

**Response to Request 3**

As stated in the response to Request 1.a, Hemyc or MT fire barrier material has not been installed in the BSEP, Units 1 and 2, for separation and/or safe shutdown purposes. Therefore, this letter completes CP&L's response to Generic Letter 2006-03 for BSEP, Units 1 and 2.