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June 7, 2006
JAFP-06-0089

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

SUBJECT: James A. FitzPatrick Nuclear Power Plant
Docket No.50-333
**Response to Generic Letter 2006-03, Potentially Nonconforming
Hemyc and MT Fire Barrier Configurations**

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

Dear Sir or Madam:

Per Reference, 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 requested information is being provided under the requirements of 10 CFR 50.54(f).

The James A. FitzPatrick Nuclear Power Plant (JAFNPP) response to the requested information in GL 2006-03 is contained in Attachment 1 to this submittal.

If you have any questions or require additional information, please contact Mr. Jim Costedio, Regulatory Compliance Manager at (315) 349-6358.

There are no commitments contained in this letter.

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

Executed on June 7th, 2006.

Very truly yours,


Pete Dietrich
Site Vice President

PD:RP:dmr

Attachment: Response to NRC Generic Letter 2006-03

cc:

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Response to NRC Generic Letter 2006-03

Requested Information

Addressees are requested to determine whether or not Hemyc 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 fire barrier types, consistent with the assessment requested in NRC Generic Letter 92-08.

Addressees that credit Hemyc 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 Hemyc and MT. Licensees are requested to provide evaluations to support conclusions that they are in compliance with regulatory requirements for the Hemyc and MT applications. Licensees that cannot justify their continued reliance on Hemyc 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 Hemyc 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 Hemyc or MT is credited in other analyses (e.g., exemptions, license amendments, GL 86-10 analyses).

JAF Response to Request 1(a):

Hemyc fire barrier wrap is relied upon at the James A. FitzPatrick Nuclear Power Plant (JAFNPP) to separate required safe shutdown equipment located in the same fire area. The Hemyc wrap is not credited in any other analyses. No MT fire barrier material is used to separate required safe shutdown equipment at JAFNPP.

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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.

JAF Response to Request 1(b):

JAF has one other instance of a fire barrier relied on for separation of redundant trains located in a single fire area. JAF utilizes an FP-60 cable wrap located in the same fire area as the Hemyc wrap. Based on NRC information contained in SECY 99-204 questioning the ability of the FP-60 to withstand a 1-hour fire rating, JAF requested and received an Appendix R exemption for the FP-60 wrap (Reference 3).

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).

JAF Response to Request 2(a):

The extent of the installation at JAF consists of approximately 40 feet of 5 inch conduit wrapped with Hemyc. The Hemyc wrapped conduit is installed in the West Cable Tunnel (Fire Area 1C) and protects a 600 volt cable which supplies power to a battery room air handling unit. Additional details can be found in the Request for Exemption (Reference 2).

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.

JAF Response to Request 2(b):

The fire testing performed on the Hemyc by the NRC (Reference 1) called into question the validity of the 1 hour Hemyc wrap installed at JAF. Based on the preliminary evidence seen from this testing, JAF conservatively determined the Hemyc did not comply with the licensing basis and chose to request an exemption from 10 CFR 50, Appendix R (Reference 2).

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NRC Request 2(c)

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

JAF Response to Request 2(c):

The compensatory measures in place at JAF consist of an hourly fire watch patrol in the area of the Hemyc wrap while the fire detectors in the West Cable Tunnel are operable. If for some reason the detectors become inoperable, a continuous fire watch will be established. These compensatory measures are specified in the Technical Requirements Manual.

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.

JAF Response to Request 2(d):

JAF submitted a letter requesting an exemption from 10 CFR 50, Appendix R such that a 30 minute fire barrier wrap is acceptable in the West Cable Tunnel (Reference 2). This exemption is consistent with a previous exemption granted for the FP-60 cable wrap (Reference 3) which is located in the same area.

NRC Request 3

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

JAF Response to Request 3:

The nonconforming Hemyc condition has been addressed as stated in the response to NRC Request 2.d.

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REFERENCES

1. "Hemyc (1-Hour) Electrical Raceway Fire Barrier Systems Performance Testing, Conduit and Junction Box Raceways", dated April 11, 2005. (Adams # ML051190046)
2. Entergy Nuclear Operation, Inc. letter to USNRC (Letter No. JAFP-05-0118), "Request for Exemption from 10 CFR 50, Appendix R, III.G.2.c Requirement for a One-Hour Rated Fire Barrier Wrap", dated July 27, 2005.
3. NRC Letter and SER, G.S. Vissing to M. Kansler (Entergy), James A. FitzPatrick Nuclear Power Plant, "Exemption from Certain Requirements of Section III.G.2.c of Appendix R to 10 CFR 50", dated May 29, 2001. (TAC No. MB0395)