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June 9, 2006

U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

ATTENTION: Document Control Desk

SUBJECT: **Calvert Cliffs Nuclear Power Plant**
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Nine Mile Point Nuclear Station
Unit Nos. 1 & 2; Docket Nos. 50-220 & 50-410
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

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

REFERENCE: (a) Generic Letter 2006-03, Potentially Nonconforming Hemyc and MT Fire
Barrier Configurations, dated April 10, 2006

In Reference (a), the Nuclear Regulatory Commission requested addressees of the generic letter to evaluate their facilities to confirm compliance with existing applicable regulatory requirements for fire barriers. The generic letter particularly asked for information on fire barriers utilizing Hemyc and MT materials. To gather this information, Reference (a) requires a written response to specific questions within 60 days of issuance of the generic letter.


Calvert Cliffs Nuclear Power Plant (CCNPP), Nine Mile Point Nuclear Station (NMPNS), and R.E. Ginna Nuclear Power Plant (Ginna) have conducted the requested evaluation. The results of those evaluations, in the form of answers to the questions posed in Reference (a), are in Attachments (1) through (3) of this letter.

This letter presents information requested by the Nuclear Regulatory Commission and contains no regulatory commitments.

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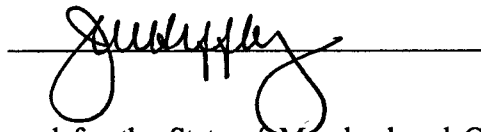
Should you have any questions regarding the information in this submittal, please contact Mr. L. S. Larragoite at (410) 897-5087 or Louis.S.Larragoite@constellation.com.

Very truly yours,


John M. Heffley
Chief Nuclear Officer

STATE OF MARYLAND :
: TO WIT
COUNTY OF ANNE ARUNDEL :

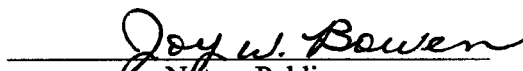
I, John M. Heffley, state that I am Chief Nuclear Officer, Constellation Generation Group, LLC, for Calvert Cliffs Nuclear Power Plant, Inc., Nine Mile Point Nuclear Station, LLC, and R. E. Ginna Nuclear Power Plant, LLC, and that I am duly authorized to execute and file this response on behalf of these companies. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by employees and/or consultants of the companies. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.



Subscribed and sworn before me, a Notary Public, in and for the State of Maryland and County of Calvert, this 9th day of June, 2006.



WITNESS my Hand and Notarial Seal:


Notary Public

My Commission Expires:

June 27, 2007
Date

JMH/EMT/jmp

- Attachments: (1) Calvert Cliffs Nuclear Power Plant Response to Generic Letter 2006-03
(2) Nine Mile Point Nuclear Station Response to Generic Letter 2006-03
(3) R.E. Ginna Nuclear Power Plant Response to Generic Letter 2006-03

cc: P. D. Milano, NRC
S. J. Collins, NRC
T. G. Colburn, NRC
Resident Inspector, NRC (Calvert Cliffs)

Resident Inspector, NRC (Ginna)
Resident Inspector, NRC (NMPNS)
R. I. McLean, Maryland DNR
J. P. Spath, NYSERD
P. Eddy, NYS Dept. of Public Services

ATTACHMENT (1)

**Calvert Cliffs Nuclear Power Plant
Response to Generic Letter 2006-03**

Attachment (1)

Calvert Cliffs Nuclear Power Plant Response to Generic Letter 2006-03

1. Within 60 days of the date of this GL [Generic Letter], 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).*

Neither Hemyc nor MT fire barrier material is used at Calvert Cliffs Nuclear Power Plant and therefore it is not relied upon for separation and/or safe shutdown purposes in accordance with the plant's licensing basis. In addition, neither Hemyc nor MT fire barrier material is credited in any other analysis (e.g., exemptions, license amendments, GL 86-10 analyses) at Calvert Cliffs Nuclear Power Plant.

- 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.*

There are no other fire barrier types in use at Calvert Cliffs Nuclear Power Plant that are relied upon for separation of redundant trains located in a single fire area.

Engineering and modification controls are in place to address changes to approved barriers and the same reviews would be applied to the selection, construction, and maintenance of any new barriers made of any types of materials. These controls ensure compliance with the plant's licensing condition on fire protection.

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:

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

Not applicable since neither Hemyc nor MT fire barrier material is used at Calvert Cliffs Nuclear Power Plant.

- b. *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,*

Not applicable since neither Hemyc nor MT fire barrier material is used at Calvert Cliffs Nuclear Power Plant.

- c. *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*

Not applicable since neither Hemyc nor MT fire barrier material is used at Calvert Cliffs Nuclear Power Plant.

Attachment (1)

Calvert Cliffs Nuclear Power Plant Response to Generic Letter 2006-03

- d. 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 since neither Hemyc nor MT fire barrier material is used at Calvert Cliffs Nuclear Power Plant.

- 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 since neither Hemyc nor MT fire barrier material is used at Calvert Cliffs Nuclear Power Plant.

ATTACHMENT (2)

Nine Mile Point Nuclear Station
Response to Generic Letter 2006-03

Attachment (2)

Nine Mile Point Nuclear Station Response to Generic Letter 2006-03

1. Within 60 days of the date of this GL [Generic Letter], 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).*

Neither Hemyc nor MT fire barrier material is used at Nine Mile Point Nuclear Station and therefore is not relied upon for separation and/or safe shutdown purposes in accordance with the plant's licensing basis. In addition, neither Hemyc nor MT fire barrier material is credited in any other analysis (e.g., exemptions, license amendments, GL 86-10 analyses) at Nine Mile Point Nuclear Station.

- 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.*

There are no other fire barrier types in use at Nine Mile Point Nuclear Station that are relied upon for separation of redundant trains located in a single fire area.

Engineering and modification controls are in place to address changes to approved barriers and the same reviews would be applied to the selection, construction, and maintenance of any new barriers made of any types of materials. These controls ensure compliance with the plant's licensing condition on fire protection.

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:

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

Not applicable since neither Hemyc nor MT fire barrier material is used at Nine Mile Point Nuclear Station.

- b. *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,*

Not applicable since neither Hemyc nor MT fire barrier material is used at Nine Mile Point Nuclear Station.

- c. *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*

Not applicable since neither Hemyc nor MT fire barrier material is used at Nine Mile Point Nuclear Station.

Attachment (2)

Nine Mile Point Nuclear Station Response to Generic Letter 2006-03

- d. 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 since neither Hemyc nor MT fire barrier material is used at Nine Mile Point Nuclear Station.

- 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 since neither Hemyc nor MT fire barrier material is used at Nine Mile Point Nuclear Station.

ATTACHMENT (3)

R.E. Ginna Nuclear Power Plant
Response to Generic Letter 2006-03

Constellation Generation Group
June 9, 2006

Attachment (3)

R.E. Ginna Nuclear Station Response to Generic Letter 2006-03

1. Within 60 days of the date of this GL [Generic Letter], 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).*

Ginna Nuclear Power Plant, LLC. (Ginna) credited the Hemyc fire barrier system as a one hour fire rated barrier for Appendix R compliance purposes. Although Ginna's Appendix R analysis does not require any three hour fire rated Hemyc or MT configurations, there is one barrier location where the MT system is used to meet a one hour requirement (located on a source range nuclear instrument preamplifier to provide additional protection). The Hemyc system is also used in the Containment Building as a radiant energy shield, which is considered operable since the Hemyc system is non-combustible.

- 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.*

There are currently no other fire barrier types in use at Ginna that are relied upon for separation of redundant trains located in a single fire area.

Engineering and modification controls are in place to address changes to approved barriers and the same reviews would be applied to the selection, construction, and maintenance of any new barriers made of any types of materials. These controls ensure compliance with the plant's licensing condition on fire protection.

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:

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

Ginna has approximately 425 feet of Hemyc conduit wrap installed on conduits ranging in sizes from ½" to 2 ½" inches in diameter. In addition, there is approximately 100 feet of Hemyc wrap installed on a single 24" cable tray. Conduit wrap is directly applied, while the tray wrap is installed using the standard vendor design consisting of Hemyc wrap installed on a frame assembly that provides an air space between the wrap assembly and the raceway.

One three hour MT barrier (approximately four feet) is used to provide additional protection for a source range nuclear instrument preamplifier in the event of a fire. The Appendix R and fire analysis requirement for the location only requires a one hour fire barrier, which is the rating for other barriers in this area of the plant.

Hemyc configurations are located in the following plant areas: Battery Room, Intermediate Building Clean Side Basement, and Auxiliary Building Intermediate Floor and Basement level. The barrier material provides protection for the following systems/circuits: AC and DC Power Distribution, Steam Generator pressure indication, Source Range Nuclear Instrumentation, and Chemical and Volume Control System charging pump power.

Attachment (3)

R.E. Ginna Nuclear Station Response to Generic Letter 2006-03

- b. *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.*

Based on a review of NRC Information Notice 2005-07, all Hemyc configurations that are required for rated protection of circuits were determined to not be conforming to Ginna's current licensing basis and declared inoperable on April 6, 2005.

- c. *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*

All Hemyc configurations that are required for rated protection of circuits have been declared inoperable. Hourly firewatch tours have been in place since April 6, 2005 and were implemented in accordance with site procedures. Additional compensatory measures, or changes to the current measures, may be considered based on NRC IEN 97-48, Regulatory Issue Summary 2005-07, and future industry guidance.

- d. *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.*

Ginna has voluntarily committed to transition to NFPA 805 as stated in the letter of intent to the NRC dated December 19, 2005, with an enforcement discretion period of three years. A project plan implementation schedule to transition to NFPA 805 has been developed. Based on the outcome of the fire probabilistic risk assessment and modeling analysis, the Hemyc wrap will be replaced with an approved fire rated material, left as is, or eliminated through the use of change evaluations.

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.**

Based on the outcome of the fire probabilistic risk assessment and modeling analysis for the transition to NFPA 805, the Hemyc wrap will be replaced with an approved fire rated material, left as is, or eliminated through the use of change evaluations.