

TXU Power
Comanche Peak Steam
Electric Station
P. O. Box 1002 (E01)
Glen Rose, TX 76043
Tel: 254 897 5209
Fax: 254 897 6652
mike.blevins@txu.com

Mike Blevins
Senior Vice President &
Chief Nuclear Officer

CPSES-200601043
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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

**SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
60-DAY RESPONSE TO NRC GENERIC LETTER 2006-03,
“POTENTIALLY NONCONFORMING HEMYC AND MT FIRE
BARRIER CONFIGURATIONS”**

**REF: NRC Generic Letter (GL) 2006-03, “Potentially Nonconforming Hemyc
and MT Fire Barrier Configurations,” dated April 10, 2006.**

Gentlemen:

NRC Generic Letter (GL) 2006-03, “Potentially Nonconforming Hemyc and MT Fire Barrier Configurations,” dated April 10, 2006, was issued to request information from licensees regarding Hemyc and MT fire barriers, or other fire barriers using the materials and configurations described in the generic letter.

GL 2006-03 requested that all addressees provide a response that contains the following information:

1. *Within 60 days of the date of this GL, 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).*

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- 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.*
- 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),*
 - 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,*
 - 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*
 - 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.*
- 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.*

Response to 1a:

CPSES uses Hemyc in limited circumstances as a radiant energy shield (RES). It is relied upon for separation and safe shutdown purposes in accordance with the CPSES licensing basis. CPSES does not use Hemyc or MT fire barrier materials as a one or three hour fire barrier for separation of redundant post fire safe shutdown circuits. The Hemyc wrap is used in the containment building as a RES.

Response to 1b:

CPSES utilizes Thermolag as raceway fire barrier protection for redundant trains located in the same fire area to satisfy 10 CFR 50, Appendix R, III.G requirements. Installation and inspection procedures verified that the barrier products were installed in a manner consistent with the testing and analyses to ensure test configurations and

criteria would be bounding to the installed configurations. Deviations from the tested configurations were evaluated in accordance with Generic Letter 86-10, Supplement 1, providing reasonable assurance that the installed fire barrier systems would provide the necessary level of protection. Fire tests were performed for electrical raceway fire barrier configurations which could not be bounded by the Generic Letter 86-10, Supplement 1 evaluations. CPSES inspects fire rated enclosures every 18 months to ensure ongoing integrity.

Test reports, previous correspondence, and additional information are available on site.

Response to 2a:

Hemyc is installed at CPSES in Unit 1 and 2 Containment Buildings as a RES. RES is a shield designed to provide protection for redundant essential raceways or fire safe shutdown equipment against the radiant energy from an exposure to fire. RES is provided in containment where redundant sets of fire safe shutdown equipment and components are separated by less than 20 feet horizontally with negligible intervening combustibles. Approximately 800 linear feet of RES is installed in Unit 1 Containment and approximately 800 linear feet of RES is installed in Unit 2 Containment. The actual linear footage of RES will be verified during the upcoming refueling outages for Unit 1 and Unit 2.

The systems protected by RES include the Reactor Coolant System, the Chemical and Volume Control System, the Residual Heat Removal System, and the Process Monitoring System. The actual Fire Safe Shutdown Equipment List is contained in Section III of the CPSES Fire Protection Report.

Response to 2b:

Hemyc is only used as RES in accordance with the licensing basis and not as a one-hour rated fire barrier material. The recent findings on Hemyc fire barrier material were from NRC testing which was performed to different requirements than when CPSES tested the RES configurations of Hemyc in the 1980s. Therefore, CPSES will evaluate the NRC test results and testing configurations for applicability to our existing design of Hemyc RES. This evaluation will be performed by December 1, 2006.

Response to 2c, 2d and 3:

Request for information 2c, 2d and 3 are not currently applicable to CPSES. If, as a result of the evaluation discussed above, CPSES determines that the installed Hemyc RES is nonconforming, CPSES will take compensatory action and corrective action as appropriate, and will inform the NRC of those actions.

This communication contains three new licensing basis commitments regarding CPSES Units 1 and 2.

Number	Description of Commitment
27405	The actual linear footage of the RES in Units 1 and 2 Containment will be verified during the upcoming refueling outages for each unit.
27406	CPSES will evaluate the NRC test results and testing configurations for applicability to our existing design of Hemyc RES by 12/01/06.
27407	If, as a result of the evaluation discussed above, CPSES determines that the installed Hemyc RES is nonconforming, CPSES will take compensatory action and corrective action as appropriate, and will inform the NRC of those actions.

Should you have any questions, please contact Mr. Jack Hicks at (254) 897-6725.

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

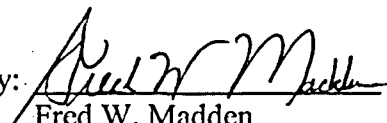
Executed on the 8th of June, 2006.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC
Its General Partner

Mike Blevins

By: 
Fred W. Madden
Director, Regulatory Affairs

jch

c - B. S. Mallett, Region IV
M. C. Thadani, NRR
Resident Inspectors, CPSES