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U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

Beaver Valley Power Station, Unit Nos. 1 and 2  
Docket Nos. 50-334 and 50-412

Davis-Besse Nuclear Power Station, Unit 1  
Docket No. 50-346

Perry Nuclear Power Plant, Unit 1  
Docket No. 50-440

**Subject: Response to NRC Generic Letter 2006-03**

On April 10, 2006, the NRC issued Generic Letter 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations." The NRC issued the letter to request that addressees evaluate their facilities to confirm compliance with the existing applicable regulatory requirements in light of the information provided in this Generic Letter and, if appropriate, take additional actions.

The FirstEnergy Nuclear Operating Company (FENOC) is submitting the attached response (Attachment 1) to address the Generic Letter for the Beaver Valley Power Station, Unit Nos. 1 and 2, the Davis-Besse Nuclear Power Station, Unit 1, and the Perry Nuclear Power Plant, Unit 1.

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There are no commitments included in this response (Attachment 2). If there are any questions or additional information is required, please contact Mr. Gregory A. Dunn, Manager – Fleet Licensing, at (330) 315-7243.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on June 8, 2006.

Very truly yours,



Danny L. Pace  
Senior Vice President, Fleet Engineering

Attachments (2)

1. Response to Generic Letter 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations"
2. Regulatory Commitments

cc: NRC Project Manager – Beaver Valley Power Station  
NRC Project Manager – Davis-Besse Nuclear Power Station  
NRC Project Manager – Perry Nuclear Power Plant  
NRC Resident Inspector - Beaver Valley Power Station  
NRC Resident Inspector - Davis-Besse Nuclear Power Station  
NRC Resident Inspector - Perry Nuclear Power Plant  
NRC Regional Administrator – Region I  
NRC Regional Administrator – Region III

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

NRC Generic Letter 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations," requests that licensees evaluate their facilities to confirm compliance with the existing applicable regulatory requirements in light of the information provided in this Generic Letter and, if appropriate, take additional actions.

Each Generic Letter question is listed below, in bold, followed by the FENOC response.

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).**

Neither Hemyc nor MT fire barrier material is currently being used at the Beaver Valley Power Station (Beaver Valley), Unit Nos. 1 and 2, the Davis-Besse Nuclear Power Station (Davis-Besse), Unit 1, or the Perry Nuclear Power Plant (Perry), Unit 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 responses to GL 92-08 to the extent that the responses address this specific issue.**

The fire barrier types that are relied on for the separation of redundant trains in a single fire area have been tested or evaluated to determine that they are capable of providing the necessary level of protection. In response to Generic Letter 92-08, actions were taken at Beaver Valley, Davis-Besse, and Perry to address this issue and responses were provided to the NRC. Additional information can be found in the docketed responses to Generic Letter 92-08.

At Beaver Valley, Thermo-Lag, 3M Interam E50 Series, and Darmatt KM-1 fire barrier material is used for separation of redundant trains located in a single fire area. This material was evaluated as requested in Generic

Letter 92-08 and NRC Information Notice 93-41, "One Hour Fire Endurance Test Results for Thermal Ceramics Kaowool, 3M Company FS-195 and 3M Company Interam E-50 Fire Barrier Systems," and found to be in compliance with the NRC requirements. Tests and evaluations were performed for Beaver Valley to determine that the Thermo-lag material properties and attributes conform to NRC regulations. Tests and evaluations were also performed on the 3M Interam E50 Series, and Darmatt KM-1 fire barrier material to determine that they conform to NRC regulations.

At Davis-Besse and Perry, 3M Interam E50 Series Flexible Mat is credited as the fire barrier material that is used to protect circuits. The 3M Interam material was installed as a replacement for Thermo-Lag in response to Generic Letter 92-08 and was qualified using test data to evaluate the fire barrier installations for endurance, combustibility, and acceptable ampacity derating factors. Some Thermo-Lag applications were retained, but are no longer credited as fire barrier material that is used to protect circuits.

Based on the tests and evaluations summarized above, Beaver Valley, Davis-Besse, and Perry each concluded that the existing fire barrier materials are capable of providing the necessary level of 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 - neither Hemyc nor MT fire barrier material is currently being used at Beaver Valley, Davis-Besse, or Perry.

**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 - neither Hemyc nor MT fire barrier material is currently being used at Beaver Valley, Davis-Besse, or Perry.

**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 - neither Hemyc nor MT fire barrier material is currently being used at Beaver Valley, Davis-Besse, or Perry.

**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 - neither Hemyc nor MT fire barrier material is currently being used at Beaver Valley, Davis-Besse, or Perry.

- 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 - neither Hemyc nor MT fire barrier material is currently being used at Beaver Valley, Davis-Besse, or Perry.

## Regulatory Commitments

The following list identifies those actions committed to by FirstEnergy Nuclear Operating Company (FENOC) for the Beaver Valley Power Station, Unit Nos. 1 and 2, the Davis-Besse Nuclear Power Station, Unit 1, and the Perry Nuclear Power Plant, Unit 1. Any other actions discussed in the submittal represent intended or planned actions by FENOC. They are described only as information and are not regulatory commitments. Please notify Mr. Gregory A. Dunn, Manager - Fleet Licensing at (330) 315-7243 of any questions regarding this document or associated regulatory commitments.

<u>Commitment</u>	<u>Due Date</u>
None	N/A