

June 9, 2006  
GO2-06-086

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397  
RESPONSE TO GENERIC LETTER 2006-03, "POTENTIALLY  
NONCONFORMING HEYMC AND MT FIRE BARRIER  
CONFIGURATIONS"**

Reference: Generic Letter, dated April 10, 2006, CI Grimes (NRC) to all Licensees,  
"Potentially Nonconforming Hemyc and MT Fire Barrier Configurations"

Dear Sir or Madam:

On April 10, 2006, the NRC issued the referenced Generic Letter (GL) to request that licensees evaluate their facilities to confirm compliance with existing applicable regulatory requirements in light of the information provided in the GL and take any appropriate additional actions. Recent confirmatory testing of the Hemyc and MT fire barriers revealed they may not perform their intended protective function during a fire. The GL also required licensees to provide a written response, as applicable, to their facilities. The GL response is provided in the enclosure herein.

Because Energy Northwest does not rely on, and has not installed, Hemyc or MT fire barriers at Columbia Generating Station, Energy Northwest is only responding to the following requests for information from the GL:

1. A statement on whether Hemyc or MT fire barrier material is used at their nuclear power plants and whether it is relied upon for separation and/or safe shutdown purposes in accordance with the license basis, including whether Hemyc or MT is credited in other analyses (e.g., exemptions, license amendments, GL 86-10 analyses).
2. 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.

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Energy Northwest makes no new commitments by this letter. If you have any questions or require additional information, please contact Mr. GV Cullen at (509) 377-6105.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the date of this letter.

Respectfully,

*Allen Champagne* FOR

WS Oxenford  
Vice President, Technical Services  
Mail Drop PE04

Attachment: Columbia Specific Information Requested by GL 2006-03

cc: BS Mallet - NRC – RIV  
BJ Benney - NRC – NRR  
NRC Sr. Resident Inspector - 988C  
WA Horin - Winston & Strawn  
RN Sherman - BPA/1399

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## Columbia Specific Information Requested by GL 2006-03

1. A statement on whether Hemyc or MT fire barrier material is used at their nuclear power plants and whether it is relied upon for separation and/or safe shutdown purposes in accordance with the license basis, including whether Hemyc or MT is credited in other analyses (e.g., exemptions, license amendments, GL 86-10 analyses).

### Energy Northwest response

Energy Northwest employs three types of materials for raceway fire barriers at Columbia Generating Station. These materials are Darmatt KM-1, 3M Interam, and Whittaker MI cable. Hemyc or MT fire barrier material is not installed for any purpose at Columbia.

2. 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.

### Energy Northwest response

#### **Darmatt KM-1**

The qualification of Darmatt KM-1 to ensure the necessary level of protection of redundant trains located in a single fire area has been evaluated in Columbia's Fire Protection File (FPF) 1.2.3, Item 2, "Qualification of Darmatt Raceway Fire Barriers." This evaluation concludes that Columbia's Darmatt designs are bounded by fire testing of Darmatt performed in accordance with GL 86-10 Supplement 1.

#### **3M Interam**

The qualification of 3M Interam to ensure the necessary level of protection of redundant trains located in a single fire area has been evaluated in Columbia's FPF 1.2.2, Item 1, "Analysis of 3M Fire Barrier Wrap." This evaluation concludes that Columbia's 3M Interam designs are bounded by fire testing of Interam performed in accordance with GL 86-10.

#### **Whittaker MI Cable**

The qualification of Whittaker MI cable to ensure the necessary level of protection of redundant trains located in a single fire area has been evaluated in Columbia's FPF 1.11, Item 2, "Qualification of Whittaker Cable as a 3-Hour Raceway Fire Barrier." This evaluation concludes that Columbia's Whittaker MI cable designs are bounded by fire testing of Whittaker MI cable in accordance with GL 86-10 and electrical property testing. Based on NRC Information Notice 2006-02, the Columbia Whittaker cable is currently

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considered non-functional and compensatory measures are in place. A plant design change is in progress to restore full qualification.