



**Pacific Gas and
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PG&E Letter DCL-06-072

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

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
60-Day Response to NRC Generic Letter 2006-03, "Potentially Nonconforming
Hemyc and MT Fire Barrier Configurations"

Dear Commissioners and Staff:

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 GL.

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 nuclear power plant 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).*
 - 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.*

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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.*

Diablo Canyon Power Plant (DCPP) does not use Hemyc or MT fire barrier materials for fire barrier separation of redundant post fire safe shutdown circuits.

DCPP utilizes 3M and Pyrocrete 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 GL 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 GL 86-10, Supplement 1, evaluations. Pacific Gas and Electric Company (PG&E) inspects fire rated enclosures outside containment every 18 months and fire rated enclosures inside containment at least every 24 months to ensure ongoing integrity.



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

Requests for Information Nos. 2 and 3 do not apply to DCPD.

In accordance with the provisions of Section 182a of the Atomic Energy Act of 1954, as amended, and 10 CFR 50.54(f), PG&E is submitting this letter under oath and affirmation.

If you have questions regarding this response, please contact Mr. Stan Ketelsen at (805) 545-4720.

Sincerely,

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Vice President - Nuclear Services

mjrm/4557

cc: Edgar Bailey, DHS
Terry W. Jackson, Senior Resident Inspector
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Diablo Distribution

