

September 11, 2006

L-HU-06-035
10 CFR 50.54(f)

U.S. Nuclear Regulatory Commission
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Rockville, Maryland 20852

Point Beach Nuclear Plant
Units 1 and 2
Dockets 50-266 and 50-301
License Nos. DPR-24 and DPR-27

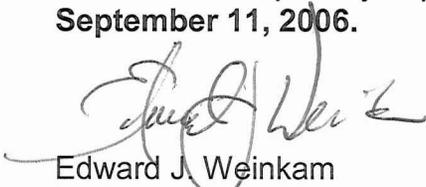
Response to Request for Additional Information for the Point Beach Nuclear Plant In
Regards to Generic Letter 2006-03: Potentially Nonconforming Hemyc and MT Fire
Barrier Configurations

- References: 1) Generic Letter 2006-03, "Potentially Nonconforming Hemyc and
MT Fire Barrier Configurations," dated April 10, 2006.
- 2) NMC Letter to the NRC, "Response to Generic Letter 2006-03:
Potentially Nonconforming Hemyc and MT Fire Barrier
Configurations," (L-HU-06-025), dated June 8, 2006.

On June, 8, 2006, the Nuclear Management Company, LLC, (NMC) provided Reference
2 in response to Generic Letter 2006-03, "Potentially Nonconforming Hemyc and
MT Fire Barrier Configurations," (Reference 1) for each nuclear unit operated by NMC.
On July 26, 2006, the U.S. Nuclear Regulatory Commission (NRC) communicated a
request for additional information (RAI) with regards to the Point Beach Nuclear Plant.
Enclosure 1 provides the response.

This letter contains no new commitments and no revisions to existing commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
September 11, 2006.



Edward J. Weinkam
Director, Nuclear Licensing and Regulatory Services
Nuclear Management Company, LLC

cc: Administrator, Region III, USNRC
Project Manager, Point Beach Nuclear Plant, USNRC
NRC Resident Inspectors, Point Beach Nuclear Plant, USNRC

Enclosure (1)

ENCLOSURE 1

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FOR THE POINT BEACH NUCLEAR PLANT RELATED TO GENERIC LETTER 2006-03

On June, 8, 2006, the Nuclear Management Company, LLC, (NMC) provided the response to Generic Letter 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations," for each nuclear unit operated by NMC. On July 26, 2006, the U.S. Nuclear Regulatory Commission (NRC) communicated a request for additional information (RAI) during a telephone conference regarding the testing of the 3M Interam E-50 Series fire barrier systems for the Point Beach Nuclear Plant installed prior to Generic Letter 86-10, Supplement 1, "Fire Endurance Test Acceptance Criteria for Fire Barrier Systems Used to Separate Redundant Safe Shutdown Trains Within the Same Fire Area," dated March 25, 1994.

The NRC staff's questions are restated below, with the NMC response immediately following.

NRC Question 1:

How was the material tested? Confirm per the phone call that the ASTM E-119, time temperature, full scale fire testing was used.

Fire testing was performed for the 3M Interam E-50 Series fire barrier systems installed at the Point Beach Nuclear Plant (PBNP) in accordance with the American Society of Testing and Materials (ASTM) Standard E-119, "Standard Methods of Fire Tests of Building Construction and Materials," dated 1976. This fire barrier system passed 1 hour fire testing conducted in accordance with the American Nuclear Insurers/Mutual Atomic Energy Reinsurance Pool (ANI/MAERP) fire test specification entitled, "ANI/MAERP Standard Fire Test Specification," included with ANI Information Bulletin 5(79), "Standard Fire Endurance Test Method to Qualify a Protective Envelope for Class 1E Electrical Circuits," dated July 1979. The ANI/MAERP fire test specification requires that protective envelopes be exposed to an exposure fire that conforms to the ASTM E-119 standard.

NRC Question 2:

What acceptance criteria was used? Confirm per the phone call that the 325°F temperature rise criteria was used. Note that the temperature rise is actually 250°F for a total of 325°F. We [the staff] assume a start at 75°F (room temperature).

As discussed during a telephone call with the staff on September 6, 2006, the 325°F limit on temperature rise was not included in the test regimen. The pre-Generic Letter 86-10, Supplement 1, 3M Interam E-50 Series fire barrier systems installed at the PBNP were subjected to the requirements of the ANI/MAERP fire test specification. The ANI/MAERP fire test specification pre-dates Generic Letter 86-10, Supplement 1, and consequently did not include acceptance criteria for the temperature of the unexposed side of the fire barrier,

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and therefore the 325°F (250°F plus ambient) limit on temperature rise was not included in the test regimen.⁽¹⁾ Test acceptance was based on satisfaction of the acceptance criteria included in Section 3.0 of the ANI/MAERP fire test specification. Interam E-50 Series fire barrier systems, installed at the PBNP prior to the issuance of Generic Letter 86-10, Supplement 1 were examined in response to Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers, and Information Notice 95-052, "Fire Endurance Test Results for Electrical Raceway Fire Barrier Systems Constructed from 3M Company Interam Fire Barrier Materials." This examination included field walkdowns of the fire barrier systems to verify installation per design and ensure satisfaction of 10 CFR 50 Appendix R separation requirements. It was concluded that these systems would be expected to meet the fire barrier qualification standards presented in Generic Letter 86-10, Supplement 1, based on the results presented in Information Notice 95-052, and the conservatism built into the fire test standard.

NRC Question 3:

How were installed configurations that were different from tested configurations evaluated? Confirm per the phone call that the field installation deviations from the tested configurations were evaluated per GL 86-10, Section 3.2.2 criteria.

As discussed during a telephone call with the staff on September 11, 2006, deviations of field installations from the tested configurations were indirectly evaluated against the Generic Letter 86-10, Section 3.2.2 criteria. Engineering evaluations have been performed to establish that the 3M Interam E-50 Series fire barrier systems installed at PBNP were qualified by representative fire endurance tests and installed in accordance with appropriate installation procedures representing the fire tested configurations. Evaluations were conducted jointly by manufacturer's representatives and PBNP personnel involving review of the installation documentation against the manufacturer's test and installation documents and plant walkdowns of the installed fire barrier systems, to document the acceptability of the as-installed barrier systems, including qualification of deviations from the tested configurations. The manufacturer's documentation included the same technical criteria addressed in Generic Letter 86-10, Section 3.2.2, and the evaluations were reviewed by qualified fire protection engineers. Additional engineering evaluations were performed by PBNP personnel in response to NRC concerns from an inspection in 2001 to document the

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1. The Purpose section of Generic Letter 86-10, Supplement 1, states, "This guidance will be used by the staff to review and evaluate the adequacy of fire endurance tests and fire barrier systems proposed by licensees or applicants in the future [emphasis added] to satisfy existing NRC fire protection rules and regulations."

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acceptability of 3M Interam E-50 Series wraps on 4 inch conduits and junction boxes installed prior to the issuance of Generic Letter 86-10, Supplement 1.

The engineering evaluations established that the Generic Letter 86-10, Section 3.2.2 criteria were satisfied. The end use application of the fire barrier material is maintained since the fire barrier assemblies were specifically designed, tested, and installed to protect cable trays, conduits, and junction boxes. The continuity of the fire barrier material, the nature of the support assembly, and the thickness of the fire barrier material are maintained for each installation since the evaluations assessed the installed configurations against the installation criteria for each specific fire barrier wrap. Each configuration was reviewed by qualified fire protection engineers and found to provide an equivalent level of protection.