



FirstEnergy Nuclear Operating Company

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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 No.1
Docket No. 50-346

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

Subject: Supplemental Information for NRC Generic Letter 2006-03

On April 10, 2006, the NRC issued Generic Letter 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations." FirstEnergy Nuclear Operating Company (FENOC) responded on June 8, 2006, via letter number BV-L-06-086, DB-Serial Number 3268, PY-CEI/NRR-2967L addressing the Generic Letter for the Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS), the Davis-Besse Nuclear Power Station, Unit No. 1 (DBNPS), and the Perry Nuclear Power Plant, Unit No.1 (PNPP). The June 8, 2006, response is being supplemented with the following information, as requested by representatives of the Nuclear Regulatory Commission (NRC) via telephone on December 13, 2006. The NRC requested that FENOC provide information regarding testing and evaluation of fire barrier material performed in accordance with NRC Generic Letter 86-10, "Implementation of Fire Protection Requirements", and NRC 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." A description of the testing and evaluation performed at each site is provided below.

For Beaver Valley Unit No. 1, testing and evaluation was performed using the guidance provided in American Society for Testing and Materials (ASTM) E 119, "Fire Testing of Building Construction and Materials," and NRC Generic Letter

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86-10, Supplement 1. The evaluation included continuity, thickness of fire barrier material, the nature of the support assembly, and the application of the fire barrier system. The evaluation concluded that the Darmatt fire wrap installed on cable trays, around air drops, and on conduit is bounded by the tested configurations.

For Beaver Valley Unit No. 2, an evaluation was performed using the guidance provided in Generic Letter 86-10. The evaluation included continuity, thickness of fire barrier material, the nature of the support assembly, and the application of the fire barrier system. The evaluation concluded that the 3M Interam E50 fire wrap installed on cable trays, around air drops, and on conduit is bounded by the 3M fire tests.

For DBNPS, each fire barrier installation configuration was qualified through performance testing to the fire and hose stream testing requirements of ASTM E 119, and as specified by NRC Generic Letter 86-10, Supplement 1. In general, the installation configuration was designed to be in accordance with previously tested configurations. Variations in the installations from the tested configuration to accommodate field conditions were evaluated based on the guidance in Generic Letter 86-10, Supplement 1. The structural steel fireproofing was in accordance with Underwriters Laboratory fire resistance designs. The electrical raceway protection was done to 3M-sponsored testing. For several plant-specific fire barrier configurations, confirmatory fire testing was required and was successfully conducted.

For PNPP, the electrical raceway fire barrier material installed to meet the requirements of Appendix R III G 2 for areas outside containment was tested to the fire and hose stream testing requirements as specified by NRC Generic Letter 86-10, Supplement 1. Variations in the installations from the tested configuration to accommodate field conditions were evaluated based on the guidance in Generic Letter 86-10, Supplement 1. The raceway fire barriers use 3M Interam E50 Series Flexible Mat; which was tested and designed after Generic Letter 86-10, Supplement 1, was issued. The vendor provided testing results, and a technical evaluation of the test results against the installed barrier configurations confirmed that the successful tests were comparable to the installed configurations. One 3M raceway barrier was installed prior to the issuance of Generic Letter 86-10, Supplement 1. This raceway barrier is installed to protect the circuits for the Unit 2 Division 2 DC power supply when in use as a backup to the Unit 1 Division 2 DC power supply. This barrier configuration was evaluated based on the requirements of Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers," and the test results provided in Information Notice 95-52, "Fire Endurance Test Results for Electrical Raceway Fire Barrier Systems Constructed from 3M Company Interam Fire Barrier Materials." The evaluation of the design change that installed the electrical raceway fire barrier

material determined that this barrier was adequate and did not need to be replaced.

Attachment 1, Regulatory Commitments, identifies that there are no commitments contained in this letter.

If there are any questions, or if additional information is required, please contact Mr. Henry L. Hegrat, Supervisor – FENOC Fleet Licensing, at (330) 315-6944.

I declare under the penalty of perjury that the foregoing is true and correct.
Executed on February 1, 2007.



Danny L. Pace
Senior Vice President, Fleet Engineering

Attachment 1. 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

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. Henry L. Hegrat, Supervisor – FENOC Fleet Licensing, at (330) 315-6944 of any questions regarding this document or associated regulatory commitments.

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