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**Jerry C. Roberts**  
Director  
Nuclear Safety Assurance

March 8, 2001

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Subject: Grand Gulf Nuclear Station  
Docket No. 50-416  
License No. NPF-29  
Update on Plans to Address Kaowool Issues

References:

1. SECY-99-204, dated August 4, 1999, "Kaowool and FP-60 Fire Barriers"
2. Letter J. C. Roberts to U. S. Nuclear Regulatory Commission, dated June 1, 2000, "Plans to Address Kaowool Issues"

GNRO-2001/00020

Ladies and Gentlemen:

By letter dated June 1, 2000 (Reference 1), we docketed the overall objectives of our plans to address NRC concerns promulgated in SECY-99-204 regarding the ability of the Kaowool Fire Barrier system to provide adequate protection for equipment required to remain functional both during and after a fire. These concerns were based on the lack of a sound technical basis for the establishment of a fire endurance rating for the Kaowool Fire Barrier system.

Our June 1, 2000 letter was premised on a requalification effort that was comprised of establishing acceptability of the GGNS Kaowool Fire Wrap system based on a compliment of fire tests, engineering evaluations and upgrades/replacement for Kaowool Fire Wrap configurations that were determined to be unacceptable.

In preparation for our requalification testing initiative, visual and destructive examinations were performed to identify bounding Kaowool raceway configurations to be tested. Results from the destructive examination of representative GGNS Kaowool wrapped raceways identified installation deficiencies that would necessitate complete removal and replacement of the Kaowool to produce bounding configurations suitable for testing.

Based on the magnitude and type of deficiencies identified, we concluded that they were germane to our entire population of Appendix R required Kaowool wrapped raceways. As such, replacement of all installed Kaowool fire wrap on Appendix R required raceways would be required to ensure that the Kaowool protected raceways would be bounded by the test results. The operational impact of these examination results was reported in Licensee Event Reports (LERs) 00-007 and 00-002, respectively.

We now plan to replace our Appendix R required fire barriers that currently rely on Kaowool Fire Wrap with a fire wrap that satisfies all applicable NRC regulatory and technical requirements verses continuing with a requalification plan. This effort will require significant resources for engineering design document development, field modifications, ampacity derating evaluations, supports reanalysis, etc. Currently, all corrective actions to replace GGNS installed Appendix R required Kaowool Fire Barriers with an alternate qualified fire barrier are planned to be completed by December 31, 2004.

Compensatory measures (fire watches), consistent with the requirements of our Fire Protection Program have been implemented and will remain in effect until all corrective actions are complete. In the interim, we will periodically keep you apprised of the progress of our proposed resolution strategy. We will provide written confirmation to the Staff upon completion of all corrective actions.

Should you have any questions or require additional information regarding this matter, please contact Charles E. Brooks at (601) 437-6555.

Yours truly,



JCR/CEB:ceb

attachment: 1. LICENSEE-IDENTIFIED COMMITMENTS

cc: (See Next Page)

cc:

Hoeg	T. L.	GGNS Senior Resident)	(w/a)
Levanway	D. E.	(Wise Carter)	(w/a)
Reynolds	N. S.		(w/a)
Smith	L. J.	(Wise Carter)	(w/a)
Thomas	H. L.		(w/o)

Mr. E. W. Merschoff (w/2) Regional Administrator U.S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011	ALL LETTERS
Mr. S. P. Sekerak, NRR/DLPM/PD IV-1 (w/2) <b>ATTN: ADDRESSEE ONLY</b> U.S. Nuclear Regulatory Commission One White Flint North, Mail Stop O7-D1 11555 Rockville Pike Rockville, MD 20852-2378	ALL LETTERS

# **ATTACHMENT 1 TO GNRO-2001/00020 LICENSEE-IDENTIFIED COMMITMENTS**

<b>Letter #:</b>	<b>GNRO-2001/00020</b>		
COMMITMENT	TYPE <small>(Check only one type)</small>		SCHEDULED COMPLETION DATE <small>(If Required)</small>
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
We now plan to replace our Appendix R required fire barriers that are currently protected with Kaowool Fire Wrap with a fire wrap that satisfies all applicable NRC regulatory and technical requirements verses continuing with a requalification plan.	X		<b>12/31/2004</b>
Compensatory measures (fire watches), consistent with the requirements of our Fire Protection Program have been implemented and will remain in effect until all corrective actions are complete.	X		<b>12/31/2004</b> <b>(fire watches to be removed as compliance is restored)</b>
In the interim, we will periodically keep you apprised of the progress of our proposed resolution strategy.	X		<b>Quarterly Recurring Commitment.</b>
We will provide written confirmation to the Staff upon completion of all corrective actions.	X		<b>02/28/2005</b>