June 20, 2001

Mr. Alexander Marion
Director, Engineering Department
Nuclear Generation Division
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, DC 20006-3708

SUBJECT: PROMATEC HEMYC AND MT ELECTRICAL RACEWAY FIRE BARRIER SYSTEMS

Dear Mr. Marion:

In your letter dated April 25, 2001, you provided useful information regarding the licensing basis associated with the Promatec Hemyc and MT electric raceway fire barrier systems at NRC regulated nuclear power plants. In particular, the previous review and discussion of these issues before the Atomic Safety and Licensing Board (ASLB) establishes the acceptability of the test protocol from a licensing basis perspective. The instances that you cite of staff acceptance of the Hemyc material further support the position that this material is part of plants' licensing bases.

In the next few months, the NRC staff will be giving careful consideration to the points that you raise. If the NRC staff chooses to question the licensing bases regarding these materials, the burden will be on the staff rather than licensees to justify any proposed course of action pursuant to 10 CFR 50.109.

Notwithstanding that the Hemyc material may be part of a plant's licensing basis, the test results that were cited do not fully address the contemporary technical concerns regarding the adequacy of this material in satisfying the intent of Commission's regulations. Specifically, technical concerns which were identified in Generic Letter 92-08, remain unresolved. These issues involve testing adequacy, for example, minimum and maximum fills were not performed for all configurations, cable damage occurred in some configurations, and energized cables were not included in all tests. Application and bounding questions concern the staff, such as, which sizes and configurations bound what other sizes and configurations.

To address the staff's technical issues that involve the testing, application and bounding of Hemyc and MT fire barrier materials, the staff plans to undertake a series of tests. We intend to invite stakeholder comments on the test configurations and design.

If you have comments or questions please feel free to contact Daniel Frumkin of my staff at 301-415-2280 (dxf1@nrc.gov).

Sincerely,

/RA/

John N. Hannon, Chief
Plant Systems Branch
Division of Systems Safety and Analysis
Office of Nuclear Reactor Regulation

If you have comments or questions please feel free to contact Daniel Frumkin of my staff at 301-415-2280 (dxf1@nrc.gov).

Sincerely,

/RA/

John N. Hannon, Chief
Plant Systems Branch
Division of Systems Safety and Analysis
Office of Nuclear Reactor Regulation

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* See previous concurrence.

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