



South Texas Project Electric Generating Station P.M. Box 219 Wadsworth, Texas 77483

April 15, 1998
NOC-AE-000129
File No.: G03.08
10CFR50

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555-0001

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Status and Schedule for Resolution of Thermo-Lag
Concerns at the South Texas Project

Reference: Correspondence from T. H. Cloninger, South Texas Project, to NRC Document Control Desk, dated July 7, 1997 (ST-HL-AE-5685)

The South Texas Project submits the following information to describe the current status of Thermo-Lag use at the facility and the expected schedule for completion of actions necessary to resolve regulatory concerns regarding Thermo-Lag. This letter serves to consolidate the South Texas Project position relative to resolution of issues related to Thermo-Lag, including the impact of Thermo-Lag on cable ampacity derating, the deviation request for continued use of Thermo-Lag in Fire Area 07, and use of Thermo-Lag in containment.

The South Texas Project understands that the Nuclear Regulatory Commission is preparing to issue an order requiring completion of activities necessary to resolve regulatory concerns regarding the use of Thermo-Lag at the South Texas Project. The following items address the actions the South Texas Project believes are needed to resolve Thermo-Lag regulatory issues at the South Texas Project.

The South Texas Project intends to complete removal of Thermo-Lag from both units by the end of 1998. Thermo-Lag is not planned to be removed from supports outside containment, although this may occur in some cases, or from one train in Fire Area 07. Thermo-Lag is being removed to simplify maintenance on affected areas, increase fire load margin, and eliminate any concerns over cable ampacity derating. Removal of all Thermo-Lag is not necessary for resolution of regulatory issues.

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Ampacity

The South Texas Project has evaluated the potential impact of Thermo-Lag on cable ampacity. The evaluation results confirm that Thermo-Lag installations at the South Texas Project pose no adverse impact relative to cable ampacity derating. Cable ampacities have been calculated with a Thermo-Lag ampacity derating factor included. The Thermo-Lag derated cable ampacities were found to be acceptable for continued plant operation. Removal of Thermo-Lag is not required to ensure that cable ampacities are maintained per the design basis. However, the South Texas Project recognizes that the Nuclear Regulatory Commission has not completed their review and that further technical efforts may be required to resolve NRC comments. To resolve any regulatory issues associated with this review, the South Texas Project plans to remove Thermo-Lag from the 24 cable trays addressed in the referenced correspondence that involve the ampacity issue with completion by the end of 1998.

Fire Area 07

A deviation request has been submitted regarding use of Thermo-Lag in Fire Area 07. The Appendix R analysis of Units 1 and 2 determined that only one train in Fire Area 07 continues to need Thermo-Lag. Safe shutdown cabling in this area was originally protected by a three-hour configuration of Thermo-Lag which was re-evaluated to qualify for a fire rating of one hour. The results of the evaluation show that the installed configurations in Fire Area 07 qualify to be credited for one-hour fire rating after minor upgrades to the interfaces with the wall and box. The South Texas Project will upgrade the wall and box interface to meet the tested configuration by the end of 1998. Fire Area 07 is not provided with an automatic fire suppression system; therefore, the requirements of Appendix R, Section III.G.2.c, are not fully satisfied. However, sufficient protection against fire damage is available in Fire Area 07 without addition of an automatic fire suppression system. Compensatory actions in place until the deviation request is approved by the Nuclear Regulatory Commission are hourly fire watch, control of combustible material, and control of access to the subject area.

In the event that the Nuclear Regulatory Commission disapproves the deviation request, the South Texas Project will take action to achieve compliance with Appendix R to be completed within 180 days following the response from the Nuclear Regulatory Commission.

Containment

The South Texas Project believes that the station is in compliance with regard to use of Thermo-Lag inside the reactor containment buildings. Thermo-Lag inside the bio-shield has been removed from both units. Thermo-Lag outside the bio-shield wall has already been included in the fire-loading analysis to ensure that it is bounded by design calculations. Fire loads due to the remaining Thermo-Lag are acceptably small (<20% of total combustible load in containment). Consequently, there is no need to order removal of Thermo-Lag from containment at the South Texas Project. Although there is no regulatory compliance issue, the South Texas Project also plans to remove the remaining Thermo-Lag from the reactor containment buildings by the end of 1998.

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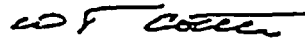
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In summary, the proposed South Texas Project commitments to be completed by December 31, 1998, to ensure regulatory compliance are:

1. Removal of Thermo-Lag from 24 cable trays with ampacity issues.
2. Upgrade Fire Area 07 to a one-hour fire rating with a contingency plan should the Nuclear Regulatory Commission disapprove the proposed deviation.

Completion of all other South Texas Project efforts with regard to Thermo-Lag is planned for the end of 1998. Should that schedule change, the South Texas Project will notify the Nuclear Regulatory Commission.

If there are any questions, please contact either Mr. P. L. Walker at (512) 972-8392 or me at (512) 972-8434.



William T. Cottle
President and Chief Executive Officer

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