The Light company
Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

August 26, 1996
ST-HL-AE-5455
STI No. 30090624
File No.: G03.08
10 CFR 50.54(f)

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Response to Request for Additional Information Regarding
Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers"

References: 1. Correspondence from T. H. Cloninger to NRC Document Control Desk dated March 28, 1995 (ST-HL-AE-5054)

2. Correspondence from Thomas W. Alexion, NRC, to William T. Cottle, South Texas Project, dated July 26, 1996

Pursuant to your request of July 26, 1996, the South Texas Project submits the attached additional information regarding Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers." The responses address the Nuclear Regulatory Commission staff's questions regarding consistency of Thermo-Lag materials, actual installation attributes as determined by destructive examination, and the results of the evaluation for Thermo-Lag radiant energy heat shields installed inside containment.

If there are any questions, please contact either Mr. P. L. Walker at (512) 972-8392 or me at (512) 972-8787.

T. H. Cloninger
Vice President,
Nuclear Engineering

PLW/lf

Attachment: Response to Request for Additional Information (July 26, 1996)

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AFFIDAVIT

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Houston Lighting & Power	)	Docket Nos. 50-498
Company, et al.,	)	50-499
	)	
South Texas Project	)	
Units 1 and 2	)	

AFFIDAVIT

I, T. H. Cloninger, being duly sworn, hereby depose and say that I am Vice President, Nuclear Engineering, of Houston Lighting & Power Company; that I am duly authorized to sign and file with the Nuclear Regulatory Commission the attached response providing additional information regarding Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers"; that I am familiar with the content thereof; and that the matters set forth therein are true and correct to the best of my knowledge and belief.

T.H. Cloninger
Vice President,
Nuclear Engineering

STATE OF TEXAS)
)
COUNTY OF MATAGORDA)

Subscribed and sworn to before me, a Notary Public in and for the State of Texas, this 26th day of August, 1996.

LINDA RITTENBERRY
NOTARY PUBLIC
STATE OF TEXAS
Notary Public, State of Texas
My Commission Expires 10/9/97

Linda Rittenberry
Notary Public in and for the
State of Texas

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION (JULY 26, 1996)

QUESTION 1:
The NRC staff has reviewed the response of March 28, 1995, to Question 1.d. of the request for additional information (RAI) of December 29, 1994, and determined that it is incomplete in regard to the consistency of Thermo-Lag materials.

Submit in writing a plant-specific response to Question 1.d. of the RAI stating that the Thermo-Lag materials used at South Texas to meet NRC regulations or licensing commitments are representative of the populations of samples that were tested by the Nuclear Energy Institute. It is not necessary to submit a copy of the results of the chemical tests or a detailed evaluation of those results. However, these documents should be retained for future NRC audit or inspection.

RESPONSE:
The Thermo-Lag material used at the South Texas Project to meet Nuclear Regulatory Commission requirements or licensing commitments, is represented by the population of samples tested by the Nuclear Energy Institute.

Samples of Thermo-Lag material from the South Texas Project were provided to the Nuclear Energy Institute for chemical testing. The results of the chemical tests were transmitted by the Nuclear Energy Institute to Mr. William T. Russell of the Nuclear Reactor Regulation branch by letter dated February 8, 1994. Representative Thermo-Lag material samples from the South Texas Project were included in the chemical test results.

The degree of chemical consistency with the other industry samples adequately demonstrates that the South Texas Project materials used to meet Nuclear Regulatory Commission regulations or licensing commitments are representative of the materials tested in the industry fire endurance tests.

QUESTION 2:
The submittal of March 28, 1995, provided information in response to the staff's RAI of December 29, 1994. In the letter, the licensee stated that a review of the installation documentation including the in-process Quality Control inspection records had been completed. Please confirm that the construction attributes specified in the December 1994 RAI and the quality control installation records match the actual installation attributes as determined by destructive examination.

RESPONSE:
Thermo-Lag samples from the South Texas Project have been subjected to destructive examination to confirm the physical attributes of the installation. The results are consistent with the installation as documented in the quality control installation records, the installation procedure, and with the construction attributes specified in the December 1994 Request for Additional Information.

QUESTION 3:
In a letter dated March 28, 1995, the licensee stated that a letter from Conrad McCracken, NRC, to Alex Marion, Nuclear Energy Institute, dated March 13, 1995, would impact the resolution of the Thermo-Lag issue for barriers installed inside containment and that the impact would require additional evaluation. Submit the results of the evaluation for the Thermo-Lag radiant energy heat shields installed inside containment, and corrective action plans and schedule.

RESPONSE:
A compliance-based reanalysis of the post-fire safe shutdown circuits inside containment was performed to determine need for the installed Thermo-Lag. The reanalysis of applications inside containment determined that the Thermo-Lag radiant energy heat shields are not required for the South Texas Project to be in compliance with Appendix R, Section III.G.

Thermo-Lag installations inside reactor containment will be removed from use. Modifications have been initiated, approved, and funded for both South Texas Project units to remove the Thermo-Lag not required. Removal from Unit 2 will begin during the next refueling outage, currently scheduled to begin in February, 1997. Removal from Unit 1 will begin during its next refueling outage, currently scheduled for September, 1997. Removal from both units is currently expected to be completed by the end of 1998.