

April 23, 2004

Mr. Paul Gunter, Director
Reactor Watchdog Project
Nuclear Information and Resource Service
1424 16th Street, NW, Suite 404
Washington, DC 20036

SUBJECT: COMPLETION STATUS FOR THE 1998 THERMO-LAG 330-1
CONFIRMATORY ORDERS (TAC NO. MC2248)

Dear Mr. Gunter:

This letter is in response to your e-mail to Sunil Weerakkody dated March 1, 2004, in which you questioned whether the U. S. Nuclear Regulatory Commission (NRC) would be posting the completion status of the Thermo-Lag 330-1 Confirmatory Orders issued in 1998 on the public web site.

Background

During the early 1990's, Gulf States Utilities reported that Thermo-Lag 330-1 had failed qualification fire tests and exhibited installation problems leading to NRC review. NRC Information Notice 92-46, "Thermo-Lag Fire Barrier Material Special Review Team Findings, Current Fire Endurance Tests, and Ampacity Calculation Errors," June 23, 1992, was issued after the NRC's initial review of ampacity derating test reports, as-built configurations, fire endurance, and installation procedures regarding Thermo-Lag 330-1. Later, Texas Utilities Electric Company (TU Electric), licensee for Comanche Peak Steam Electric Station, and the NRC conducted a series of fire endurance tests to assess the fire performance of electrical raceway fire barrier configurations and 1-hour and 3-hour Thermo-Lag prefabricated panels. NRC Bulletins 92-01, "Failure of Thermo-Lag 330 Fire Barrier System to Maintain Cabling in Wide Cable Trays and Small Conduits Free from Fire Damage," June 24, 1992, and 92-01, Supplement 1, "Failure of Thermo-Lag 330-1 Fire Barrier System to Perform its Specified Fire Endurance Function," August 28, 1992, contained the results of the TU Electric and NRC fire endurance tests. After fire endurance tests and reviews, the NRC had three remaining areas of concern, as follows: the fire endurance capability of Thermo-Lag 330-1 barriers, the ampacity derating of cables enclosed in Thermo-Lag 330-1 barriers, and the evaluation and application of the results of tests conducted to determine the fire endurance ratings and the ampacity derating factors of Thermo-Lag 330-1 barriers. The NRC issued Generic Letter (GL) 92-08, "Thermo-Lag 330-1 Fire Barriers," December 17, 1992, to verify that the Thermal Science, Incorporate Thermo-Lag 330-1 fire barrier systems comply with the NRC's requirements by requesting additional information from the licensees.

Subsequently, NRC staff met with licensees to discuss their plans and schedules for implementing GL 92-08, "Thermo-Lag 330-1 Fire Barriers," corrective actions. The staff became concerned with licensees completing their commitments when a number of licensees reported that they had passed their completion dates. In 1998, the NRC issued Confirmatory Orders to each plant listed in Table 1 (enclosed). A consent letter was sent to each licensee requesting consent to incorporate their commitments into a Confirmatory Order Modifying their license(s). Most licensees signed and returned the consent; however, a number of licensees modified or created their own consent letter. Once the NRC staff received and reviewed the consent letters, the Confirmatory Orders were issued, which included the licensees' implementation schedules. The licensees were required to submit completion letters once all corrective actions were complete. The completion letters indicated that all corrective actions required by GL 92-08 and the 1998 Confirmatory Order were completed.

At this time, the NRC staff does not plan to add this information directly to the NRC public web site; however, the staff has ensured that all information is readily available in our Agencywide Document Access and Management System (ADAMS), which is accessible through the public web site.

Table 1 includes the date and location (ADAMS Accession Number) for the signed consent letters, the Confirmatory Orders, and the completion letters for each plant. St. Lucie, Unit 2, and North Anna, Unit 2, did not receive Confirmatory Orders in 1998 because they completed corrective actions required by GL 92-08 on June 23, 1998, and May 1, 1998, respectively. The Confirmatory Order completion letter for Surry, Units 1 and 2, dated February 2, 1999, indicated that the corrective actions for Unit 1 had been completed and that the corrective actions for Unit 2 would be completed during the April 1999 outage. Corrective actions for Unit 2 were reported complete in a letter dated July 7, 1999.

If you should need additional assistance locating publicly available NRC documents concerning fire protection, please feel free to contact me at 301-415-1992. In accordance with Title 10 of the *Code of Federal Regulations*, Section 2.790, a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

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

Enclosure: Table 1

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John N. Hannon, Branch Chief **//RA//**
 Plant Systems Branch
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Enclosure: Table 1

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Incoming: ML040640983 Package: ML041120114

ADAMS Accession No. ML041120065

NRR-106

OFFICE	PDII-2/NSI	PDII-2/PM	PDII-2/LA	PDII-2/SC(A)	SPLB/SC	SPLB/BC
NAME	LMiller	EBrown	BClayton	WBurton	SWeerakkody	JHannon
DATE	04/23/04	04/23/04	04/23/04	04/23/04	04/23/04	04/23/04

Enclosure: Table 1

TABLE 1: THERMO -LAG 330-1 CONFIRMATORY ORDER DOCUMENTATION				
Plant/Docket No.	Order Consent	Confirmatory Order	Order Completion	Comments
St. Lucie 1 50-335	06/03/98 ML040990305	07/13/98 ML013580124	04/07/00 ML003703549	St. Lucie Unit 2 did not receive a confirmatory order, completed GL 92-08 corrective actions June 23, 1998. (ML0411000530)
Three Mile Island 1 50-289	05/05/98 ML040990295	05/22/98 ML003765653	12/30/99 ML003676460	TMI-1 has 2 orders (08/11/1999 (ML003766024)) & 2 completion letters (03/12/2000 (ML003693928)).
Columbia 50-397	03/12/98 ML022130148	03/25/98 ML022130143	01/19/00 ML003678400	
Peach Bottom 2 & 3 50-277, 278	04/27/98 ML011560812	05/19/98 ML040990313	10/12/99 ML040990314	
Limerick 1 & 2 50-352, 353	04/27/98 ML011560812	05/19/98 ML011560778	09/17/99 ML040990326	
Crystal River 3 50-302	05/06/98 ML040990150	05/21/98 ML020670496	05/25/00 ML003722384	
Susquehanna 1 & 2 50-387, 388	06/03/98 ML010160066	07/02/98 ML010160064	04/28/00 ML003711917	
North Anna 1 50-338	05/22/98 ML040990299	06/15/98 ML013530026	02/01/99 ML040990189	North Anna Unit 2 did not receive a confirmatory order, completed GL 92-08 corrective actions 05/22/1998 (ML0410990299).
Sequoyah 1 & 2 50-327, 328	05/13/98 ML041000264	06/18/98 ML013320074	06/30/99 ML040990478	
Davis-Besse 50-346	06/11/98 ML040990279	06/22/98 ML021210216	01/25/99 ML040990274	
Clinton 50-461	05/22/98 ML040990486	06/26/98 ML020990547	04/27/99 ML040990340	
Comanche Peak 1 & 2 50-445, 446	06/02/98 ML040990290	07/28/98 ML021820291	12/22/98 ML040990491	
Turkey Point 3 & 4 50-250, 251	02/08/99 ML040990332	07/09/99 ML013390600	06/18/01 ML011770240	Turkey Point's original order consent was modified by consent letter dated 05/27/1999 (ML040990320).
Oyster Creek 50-219	05/11/98 ML040990364	05/22/98 ML040990167	01/30/01 ML010370267	
Hatch 1 & 2 50-321, 366	06/02/98 ML040990485	06/24/98 ML013030297	10/16/98 ML040990196	
Surry 1 & 2 50-280, 281	05/22/98 ML040990350	07/09/98 ML012700090	02/01/99 ML040990189	Surry Unit 2 completion letter 07/07/1999 (ML041000485).
South Texas Project 1 & 2 50-498, 499	06/25/98 ML040990350	10/02/98 ML040990301	02/08/99 ML040990180	

Y020040053 - COMPLETION STATUS FOR THE 1998 THERMO-LAG 330-1
CONFIRMATORY ORDERS (TAC NO. MC2248)

Dated: _____

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