



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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September 26, 1997
GO2-97-177

Docket No. 50-397

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

Gentlemen:

Subject: **NUCLEAR PLANT WNP-2, OPERATING LICENSE NPF-21
CHANGES TO THERMO-LAG 330-1 RESOLUTION PLAN**

- References:
- 1) Letter GO2-95-082, dated April 27, 1995, JV Parrish (SS) to NRC, "Plan for Resolution of Thermo-Lag 330-1 Concerns"
 - 2) Letter GO2-96-097, dated May 3, 1996, JV Parrish (SS) to NRC, "Schedule Change for Resolution - Generic Letter 92-08, Thermo-Lag 330-1 Fire Barriers"

The purpose of this letter is to inform you of changes in our plan for resolution of Thermo-Lag 330-1 fire barrier concerns which was developed in response to Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers." These changes consist of the continued use of one section of 3M fire barrier material, re-routing of certain post-fire safe shutdown circuits with fire-rated cables, and the upgrading of barriers and use of fire wrap material instead of installing fire-rated walls.

In the first reference, the Supply System stated that existing Thermo-Lag and 3M fire barrier materials would be abandoned in place unless combustible loading or physical interference issues would mandate removal. Based upon further review and testing results, we have determined that a 250 foot section of 3M Interam material will remain credited as a qualified three-hour fire barrier. There are three sections of this 3M raceway wrap which interface with Thermo-Lag 330-1 and require modification. These interfacing sections will be upgraded with 3M material to meet the guidance of Generic Letter 86-10, Supplement 1.

In addition, some post-fire safe shutdown circuits will be re-routed using silicon dioxide fire-rated, mineral-insulated cable manufactured by Whittaker Electronic Resources. Current plans are to use this cabling in one and three-hour fire areas. Fire testing in accordance with ASTM E-119 has demonstrated that the cable is capable of maintaining conductor continuity, with an acceptable current resistance profile based on conductor heating. The Supply System also plans to arrange for additional fire testing of Whittaker cable in the configuration that will be applied at WNP-2.

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In the first reference we also proposed to install fire-rated walls at various locations within the plant. Following further review, we have decided to modify this approach by upgrading existing barriers or penetrations from "nonessential" to "essential" fire protection components, and applying fire wrap material to protect circuits where appropriate.

These changes will have no impact on the current fire barrier resolution time-table as previously provided in the referenced letters. The Supply System is proceeding as scheduled and modification packages are being developed in support of the required physical plant modifications. As noted in the second reference, current plans are to complete resolution of the Thermo-Lag issues during 1999.

During an April 29, 1997 meeting with the staff, the Supply System committed to keep the NRC informed of the schedule for testing of Whittaker fire cables in order for the staff to observe these tests. Testing of the fire-rated cables is tentatively scheduled for late November 1997. Following confirmation, the staff will be informed of the exact date for the Whittaker fire cable test.

The Supply System also committed to provide a time line or schedule for completion of the design modification work packages, including a percentage completion. We are 32 percent complete with work associated with resolving post-fire safe shutdown Thermo-Lag issues. This includes design and analysis, construction and package closeout. Final implementation will occur during the R-14 Maintenance and Refueling Outage (Spring 1999). Overall work package close-out will be completed by December 1999.

Should you have any questions or desire additional information regarding this letter, please call me or P.J. Inserra at (509) 377-4147.

Respectfully,



W. Parrish
Chief Executive Officer
Mail Drop 1023

Attachment

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