

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

July 19, 1993

Docket No. 50-247

Mr. Stephen B. Bram Vice President - Nuclear Power Consolidated Edison Company of New York Broadway and Bleakley Avenue Buchanan, New York 10511

Dear Mr. Bram:

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PDR

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SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 2. RESPONSE TO GENERIC LETTER 92-08, "THERMO-LAG 330-1 FIRE BARRIERS" (TAC NO. M85560)

By letter dated April 16, 1993, Consolidated Edison Company of New York Inc. (Con Edison) provided a response to Generic Letter (GL) 92-08 for Indian Point Nuclear Generating Unit No. 2 (IP2). Thermo-Lag 330-1 fire barrier material is installed in two locations to protect components required for safe shutdown capability. One installation is to protect the conduit containing power cables for residual heat removal (RHR) Pump No. 22 and the second is around containment penetration H20 to protect cables for Alternate Safe Shutdown System (ASSS) instruments. Although the response stated that the Thermo-Lag 330-1 fire barriers installed at IP2 were not qualified by conducting individual specific fire endurance tests for the exact installed configurations, Con Edison's response stated that the use of Thermo-Lag was based on reviews of generic fire endurance tests and technical information supplied by the vendor and industry and NRC acceptance of the product. The design and construction of the configurations were based on the constituent Thermo-Lag materials meeting the requirements of ASTM E-119 fire endurance testing as reported by the vendor and as accepted by American Nuclear Insurers. The barriers were installed in accordance with the vendor's "Installation Procedures Manual" by a vendor-certified installer under the supervision of a vendor representative and contract Quality Assurance personnel responsible to Con Edison.

Although Thermo-Lag barriers were evaluated and may have been considered qualified, the results of recent tests and inspections indicate that further actions are now necessary to address fire endurance and ampacity derating of Thermo-Lag barriers. Con Edison's response states that appropriate actions to resolve these concerns are being developed through an industry program coordinated by Nuclear Management and Resources Council (NUMARC) and Con Edison would apply the results of the industry program, when completed, to the Thermo-Lag 330-1 installations at IP2.

Compensatory measures for inoperable barriers are in place and will remain in place until the fire barriers can be declared operable. In the case of the FILE GENTER COPY DROI No. 22 RHR Pump conduit, the Thermo-Lag has now been removed based on an

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Mr. Stephen B. Bram

engineering evaluation. The RHR pumps are required to achieve and maintain cold shutdown conditions. Repairs for cold shutdown systems are allowed by 10 CFR Part 50, Appendix R, Section III.L.5. The engineering evaluation determined that a repair action, consisting of the proceduralized use of a pre-lugged cable, can be performed which is acceptable to meet the requirements of Appendix R for fires in RHR Pump No. 21 room. Therefore, the Thermo-Lag fire barrier is no longer necessary for the protection of the portion of the normal power supply for RHR Pump No. 22 that is located within RHR Pump No. 21 room. For this barrier, the compensatory measures will remain in effect until a modification, procedure changes, and training to support the permanent removal of the Thermo-Lag barrier can be implemented.

Con Edison's April 16, 1993, response stated that ampacity is no longer a concern at IP2 since the Thermo-Lag fire barrier configuration for RHR Pump No. 22 has been removed and that the remaining Thermo-Lag installation for Penetration H20 involves only instrument cables.

In Con Edison's response to GL 92-08, Con Edison indicated that the actions necessary to restore (or confirm) the operability of the remaining fire barrier at Penetration H20 will be based on possible use of a replacement fire barrier material and on the results of the NUMARC program. The NRC staff expects that licensees referencing the NUMARC program will review the results and, within 30 days after the completion of the program, inform the NRC of the actions necessary and the schedule for restoring the operability of these fire barriers including plant specific or unique fire barrier configurations that are not bound by the NUMARC program. In accordance with the reporting requirements of GL 92-08, Con Edison is also to confirm, in writing, completion of the corrective actions.

The information requested by this letter is within the scope of the overall burden estimate in GL 92-08, which was an average of 300 person-hours for each addressee's response. This request is covered by Office of Management and Budget Clearance Number 3150-0011, which expires June 30, 1994.

Sincerely,

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Francis J. Williams Jr., Project Manager Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

cc: See next page

Mr. Stephen B. Bram Consolidated Edison Company of New York, Inc.

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Original signed by: Francis J. Williams Jr., Project Manager Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

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