

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the Matter of)
The Cincinnati Gas & Electric)
Company, et al.) Docket No. 50-358
(Wm. H. Zimmer Nuclear Power)
Station)

INTERVENOR MIAMI VALLEY POWER PROJECT'S
AMENDMENT TO ITS PETITION FOR LEAVE TO INTERVENE

Proposed Contention 17

Fire insulation material which is being used to protect the cables in the cable trays from fire is inadequate to protect the cables in light of the cable tray installation design and cable tray load. The test of the fire insulation material were improperly performed in that conditions which will exist during operation were not adequately simulated.

Support For Proposed Contention 17

Following the incident at the Browns Ferry Nuclear Plant on March 22, 1975, in which cables caught fire, the NRC has required that licensees take steps to prevent that type of occurrence at other plants.

There is no evidence that applicants have taken steps to prevent a similar occurrence at Zimmer Power Station. The cable tray installation design is the same at Zimmer as it was at Browns Ferry: three layers of cable trays are stacked one on top of the other and contain backup control cables. Thus if a fire or heat damage from a fire occurs in one cable tray

it can easily spread and both primary and backup control cables would all be damaged. Additionally, the cable trays are overloaded with cables, thus increasing the amount of heat being generated in each cable tray, adding to the possibility of heat damage.

Applicants are using an insulation material manufactured by the Babcock and Wilcox Company called KOAWOOL, a ceramic fiber material. This material is wrapped around the three levels of cable trays in order to prevent fire and heat damage to the cables in the cable trays.

Applicants submitted a report regarding the testing of this material which found the material adequate. The report is "Fire Protection Cable Tray Fire Tests, September, 1978 through January 1979 for William H. Zimmer Nuclear Station" which is Revision 12 to the Fire Protection Evaluation Report. The report is dated March 1, 1979.

The test was improperly performed in several respects because it did not simulate the conditions existing at the Zimmer Station. When the insulation material was tested the cable trays were not stacked three on top of each other, only one tray was wrapped with the material and tested. Also, the cables were not overloaded in the trays as they are at the Zimmer Station. The trays did not have the side supports on them which have been added. The vertical fittings were not separately tested; merely turning a straight section on its side does not adequately test a vertical fitting. Thus although the report states that the worst conditions were simulated, when the insulation material was tested, this was not really so.

The report states that the test was documented in a U.L. Laboratory Report #R8758 dated September 5, 1978. In fact the test results were not documented. Mr. Edwin Hofstadter, in a confidential manner, secured details of a test of the fire insulation material which show the material failed to pass the test.

Respectfully submitted,

Leah S. Kosik

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Attorney for MVPP

Dated: April 30, 1979

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CERTIFICATE OF SERVICE

I hereby certify that copies of the above Motion to Amend
and the Amendment have been sent to the following parties by ordinary U.S.
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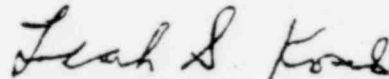
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MIAMI VALLEY POWER PROJECT



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