

NOV 16 1976

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Docket No. 50-346

Toledo Edison Company
 ATTN: Mr. Lowell E. Roe
 Vice President, Facilities
 Development
 Edison Plaza
 300 Madison Avenue
 Toledo, Ohio 43652

bcc: J. R. Buchanan, NSIC
 T. B. Abernathy, TIC

Gentlemen:

SUMMARY OF MEETING WITH TOLEDO EDISON COMPANY REGARDING THE DAVIS
 BESSE NUCLEAR POWER STATION, UNIT 1 SEPARATION CRITERIA

As you know, a meeting was held in Bethesda, Maryland on October 23, 1976, to discuss the separation criteria for wireways and conduits in the general plant areas and the cable spreading room of Davis Besse, Unit 1 (DB-1).

This meeting was a follow-up to our site visit of October 6, 7 and 8, 1976, addressing the staff's concerns identified at the site (see Item 15 of the site visit report dated November 15, 1976). The Enclosure to this letter identifies the concerns expressed by the staff and their resolution.

We request that you amend the DB-1 FSAR to conform with the resolutions as stated in the Enclosure to this letter. In order to expedite our review regarding these matters, we request your response be submitted by November 30, 1976. If you cannot meet this date, please inform us within 5 days after receipt of this letter.

Please call us if you have any questions concerning these matters.

Sincerely,

Original Signed by
 John E. Stolz
 John F. Stolz, Chief
 Light Water Reactors Branch No. 1
 Division of Project Management

Enclosure: As stated

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MAH W

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| cc: See page 2 | | | | |
| OFFICE → | LWR 1 | LWR 1 | | |
| SURNAME → | L Engle | J Stolz | | |
| DATE → | 11/16/76 | 11/16/76 | | |

Toledo Edison Company

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NOV 16 1976

cc: Mr. Donald H. Hauser, Esq.
The Cleveland Electric Illuminating
Company
P. O. Box 5000
Cleveland, Ohio 44101

Gerald Charnoff, Esq.
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ENCLOSURE

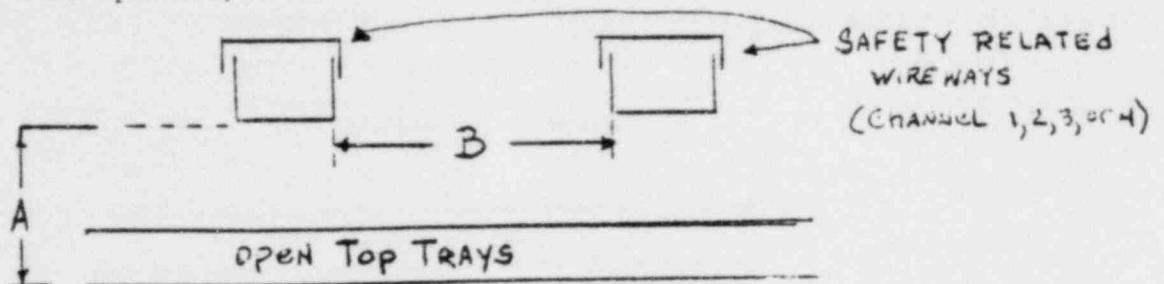
MEETING SUMMARY, OCTOBER 28, 1976
DAVIS BESSE, UNIT 1

In a recent Amendment (36) to the FSAR the applicant described their proposed separation criteria for cable routing for general plant areas and in the cable spreading room (FSAR Figure 8-20 A, B, and C). The staff expressed concern that the proposed separation criteria as documented in Amendment 36 appeared to be inconsistent with information previously submitted and discussed with NRC Region III Inspection and Enforcement, and NRC Licensing. The applicant was requested and agreed to (1) supplement the FSAR and provide justification for the proposed separation criteria used for cables routed in conduits, (2) clarify the apparent discrepancies in their proposed criteria, and (3) document the following commitments agreed upon during the meeting.

1. The applicant stated that their separation criteria for totally covered trays, wireways and conduits is the same and committed to document this criteria in the FSAR.
2. The applicant pointed out that limited amounts of "CCC" cable used for intercommunication between redundant safety logic cabinets are routed in wireways. This cable has not been verified by test to have equivalent flame retardant properties as the cables previously reviewed by the staff. To resolve the staff's concerns regarding fire in wireways, the applicant committed to inject flame retardant "silicone rubber foam" inside the safety related wireways

wherever this cable is routed, and document this commitment in the FSAR. They will also provide justification supporting the adequacy of the fire characteristics of this material.

3. The applicant agreed to document in the FSAR the following criteria for redundant safety related wireways when routed over open trays.



- a. If "A" is less than 46 inches, adequate barriers extending horizontally no less than 12 inches to each side of the wireway between the open tray and the wireway, will be provided to preclude fire damage of redundant safety related wireways in the event of fire in the open tray.
- b. If "B" is less than 24 inches, an adequate fire barrier will be provided between the redundant wireways.

During the discussion, the applicant was advised that their design requirements for fire protection should be consistent with the requirements stated in Appendix A of Regulatory Position 9.5.1.

4. The applicant was requested and agreed to document in the FSAR that when thermal barriers are provided in areas where

minimum horizontal distances between redundant trays and/or wireways is less than one inch, these thermal barriers would extend beyond these raceways with sufficient overlap (i.e., approximately $\frac{1}{2}$ inch beyond the top of the tray and/or wireway and approximately $\frac{1}{2}$ inch beyond the bottom of the tray or wireway).

5. The staff's concern regarding cable routing in metal conduits could not be resolved during the meeting and remains an open item in the SER. The staff requested that the applicant justify their proposed criteria (as stated in Figure 8.20 A, B, and C of the FSAR, Amendment 36) in areas where redundant conduits are routed over open trays or modify their design to be compatible with the criteria established for wireways (see Item 4 and Item 1). The applicant indicated that they may submit test results of the fire tests that were conducted on these conduits as their justification, or consider other alternatives. In addition, the applicant identified that in areas throughout the plant the safety related redundant conduit may be touching each other. Subsequent to the meeting the staff reviewed this design feature and concluded that such a design is unacceptable. It is the staff's position that redundant conduits must be separated by at least one inch of free air space or suitable thermal barriers be provided. The applicant is requested to document the implementation of this requirement in the FSAR.

6. The applicant stated that thermal blankets (Kawool or equivalent) will be provided on all open cable trays with certain exceptions (e.g., trays inside containment and within the cable spreading area). The applicant was requested to document this commitment in the FSAR, identify all exceptions and justify these exceptions on some other defined basis. In addition, the staff is pursuing with the applicant the possibility of whether these blankets can be justified for use as barriers in other portions of the plant such as the cable spreading area.

MEETING ATTENDEES
DAVIS BESSE, UNIT 1

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|----------------|----------------|
| L. Engle | NRC |
| J. Stolz | NRC |
| A. Ungaro | NRC |
| R. Wright | ACRS |
| A. Szukiewicz | NRC |
| C. Miller | NRC |
| G. Stashih | Bechtel |
| J. Reilly | Bechtel |
| S. Saba | Bechtel |
| S. Cantor | Bechtel |
| P. Anas | Bechtel |
| F. Cheng | Bechtel |
| D. Hayes | NRC-Region III |
| F. Jablonski | NRC-Region III |
| G. Hurrell | TECo. |
| M. Calcamuggio | TECo. |
| L. Roe | TECo. |