Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 6, 1994

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Subject: LaSalle County Nuclear Power Station Units 1 and 2

Commonwealth Edison Company Response to NRC request for information via conference call pertaining to the company's Thermo-Lag Test Program

NRC Dockets 50-373 and 50-374

Per our conversation and your request on 3/23/94, attached please find CECO's Test Plan (procedure) (Attachment 1)for Thermo-Lag and upgraded material testing for LaSalle Station application for your review and concurrence. This procedure has been reviewed and approved by our Engineering department. The test plan includes the conceptual design of a prototype specimen which represents a composite of LaSalle County Station, Units 1 and 2 conditions where the new material/design is intended to be installed. Conceptual design drawings of anticipated upgrades are included for your comparison. (Attachment 2)

It is our plan to perform this test at Favordale Laboratories in Darlington, United Kingdom by May 30, 1994.

Commonwealth Edison Co. is the sole owner of the subject test plan for the specific details and test results for LaSalle County Nuclear Station application indicated in the procedure.

The following is our response to your concerns in the area of:

*Independent Review and Verification of the Testing Process and Test Results.
*Controlling the testing process
*Testing process custody

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ADD: NRR/DRPW/PD3-1 1 1

In regard to the facility performing the test, Favordale Engineering Group is one of four autonomous business group within Darchem Engineering Ltd (supplier of MK1), itself a wholly owned subsidiary of the Weir Group PLC, one of Britain's leading international mechanical companies. The Faverdale holds NAMAS accreditation (Attachment 3).

Our Test program (TR-213) will be performed as a SAFETY RELATED project in accordance with Transco's Quality Assurance Program as reviewed and accepted by Commonwealth Edison Co. Further, Faverdale Technology Center will perform Quality Control inspection of the raceway fabrication and of the specimen installation, conduct/witness the test, and write the final report of the test. Commonwealth Edison will be represented at each of the above steps and conduct an independent review prior to acceptance for implementation.

Currently, a Commonwealth Edison Co. representative is performing a source (site) inspection at the Faverdale Testing facility to verify the acceptability of their facility prior to starting our test in May 1994.

Again, it is Commonwealth Edison Co's intention to verify the accuracy and the acceptability of the entire testing process using independent verification methodology.

In regard to custody of the specimen during fabrication, it is our understanding that suitable security arrangements can be provided. This will be verified by our on-site representative. We are investigating now whether the specimen can be placed in an area with a numbered metal band/seal or by using a locking trap (over and under the specimen) that can utilize a similar band/seal arrangement.

We understand your concern focuses on guarding against the possibility of tampering with the specimen prior to the test. We feel that implementing the following actions will ensure the security of the test specimen prior to testing:

* Have Quality Control verify thickness (and/or weight) of each piece of the Darmatt KM1 material before it is installed on the test specimen and then physically initial/mark each piece so that these initial/marks are highly visible after all pieces are assembled. This would provide tangible proof that the pieces as manufactured and independently inspected are in fact those pieces being tested.

* Because of the nature of the material (finished sheets wrapped in fabric), it is not possible to tamper with the final installation product (there is nothing that could be changed or added [extra trowel-on materials similar to TSI's application, extra pieces/thicknesses, and so on] to augment the chances of passing the test.

Please direct any questions pertaining to this response to Mr. Shahram Javidan at (708) 663-7671.

Sincerely,

Martin J. Vonk
Generic Issues Administrator
Nuclear Regulatory Services

Attachments:
1) Test Procedure No. RE-213 Rev. 1
2) LaSalle Station Conceptual Drawings for Thermo-Lag Installations
3) National Measurement Accreditation Service certification for Faverdale Laboratory

cc: J. Martin, Regional Administrator, NRC Region III
W. Schaefer, NRC Region III
J. Dyer, Director of Directorate III, NRR
G. Dick, Generic Issues Project Manager, NRR
A. Gody, Jr., LaSalle Project Manager, NRR
S. West, DSSA, NRR

Attachment 1

Test Procedure
No. TR-213

One Hour Fire Test of Darmatt KM1 System for Protecting Cable Tray, Conduit, Supports, and Junction Boxes In LaSalle N.P.S. Unit 1 and 2 Diesel Generator Corridors

March 25, 1994

208293

Subject: Review and approval of Test Procedure
by Commonwealth Edison Co.
Test Procedure No. TR-213 Rev. 1
Transco Product INC

The subject procedure has been reviewed and approved for use by the under signed. This procedure is for one hour test of Darmatt KM1 Material for protecting Safe Shutdown Cables at LaSalle County Nuclear Power Station, Units 1 and 2.

Any future changes to this procedure must be reviewed and accepted by the under signed or their designated person prior to implementation.

Jim Behn
Fire Protection Engineer
NETS

Rodney Vickers
Fire Protection System Engineer
LaSalle Station

Robert Tomala
Lead Engineer
LaSalle Station

Shahram Javidan
Program Team Leader
NETS

Paul E. Dietz 3/25/94
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TRANSCO® PRODUCTS INC.
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March 25, 1994

Mr. Shahram Javidan
Senior Engineer, Thermo-Lag Program
Commonwealth Edison Company
1400 Opus Place, Suite 400
Downers Grove, Illinois 60515

Subject: Commonwealth Edison Company
LaSalle County Station N.P.S. Thermo-Lag Program
Transco Products Inc. Test Procedure No. TR-213, Revision 1

Dear Mr. Javidan,

Please find attached Revision 1 of our test procedure No. TR-213 titled "*One Hour Fire Test of Darmatt KM1 System for Protecting Cable Tray, conduit, Supports, and Junction Boxes In LaSalle N.P.S. Unit 1 and 2 Diesel Generator Corridors*". This revision incorporates comments gathered during our March 15, 1994 meeting at LaSalle County Station. Revised items are as highlighted using a vertical line in the right margin of the text.

In general, additional justifications for test methodology as they reflect on LaSalle's bounding conditions were typically inserted in Section 1.0, SYNOPSIS of the procedure. These discussions explained our reasoning for:

- testing empty trays (smallest heat mass to qualify trays with any number of cables);
- testing Darmatt® without the use of Thermo-Lag utilized in the test specimen (to be used to qualify physical installations which are completely/partially wrapped with Thermo-Lag);
- horizontal Darmatt® KM1 joints having the same support whether or not the cable tray is wrapped with Thermolag for the test;
- demonstrating long horizontal joints to qualify long vertical joints.

- using other Darchem "stand-alone test" if needed for conduit installations;
- terminating the tray at one furnace wall to demonstrate a short cable drop from smaller round openings;
- wrapping hangers to the ceiling of the test specimen; and,
- using plant representative conditions for raceway assembly construction

Wire size (AWG 8) used inside of conduits and trays (and as airdrops) as the element to which thermocouples are attached was also verified.

We believe we have addressed all of the meeting comments as discussed in this revision to our procedure. Should you have any questions or comments regarding our procedure, please do not hesitate to call us.

Most sincerely,
TRANSCO PRODUCTS INC.

Gregory J. Jarosz
Product Manager

cc: Robert Goss
Kevin Hawks