

April 7, 1994

Mr. Alex Marion  
Manager, Technical Division  
Nuclear Energy Institute  
1776 Eye Street, N.W., Suite 300  
Washington, D.C. 20006-3706

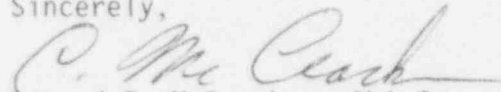
Dear Mr. Marion:

As discussed during the March 16, 1994 meeting, I committed to provide you with the staff comments on the draft "Industry Application Guide to Evaluate Existing Thermo-Lag Fire Barrier Systems" (Draft D, dated 3/3/94), prepared by the Nuclear Energy Institute (NEI) and submitted to the NRC on March 4, 1994. The staff has completed its review and as discussed in the meeting we consider this to be a work in progress that may require several iterations to achieve agreement. We are concerned that the current draft of the guide is limited in that it does not clearly identify those fire barrier systems that can fully perform either their 1 hour or 3 hour fire resistive function as required by the regulation. Enclosed are the detailed results of this review. As discussed at the March 16, 1994 meeting, the staff continues to have concerns with the technical basis for the fire barrier acceptance criteria and evaluation methodology proposed by NEI for generic industry application. Additional technical justification is required to support the positions taken by NEI concerning the proposed acceptance criteria and bounding assumptions.

Please provide the additional information requested in the enclosure. We will continue to work with NEI during the development of a generic application guide to aid in the resolution of the Thermo-Lag issue.

If you have any questions, please contact Mr. Steven West, at (301) 504-1220.

Sincerely,



Conrad E. McCracken, Chief  
Plant Systems Branch  
Division of Systems Safety and Analysis  
Office of Nuclear Reactor Regulation

Enclosure:  
As Stated


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