

June 22, 1994

Docket Nos. 50-373
and 50-374

Mr. D. L. Farrar
Manager, Nuclear Regulatory Services
Commonwealth Edison Company
Executive Towers West III, Suite 500
1400 OPUS Place
Downers Grove, Illinois 60515

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PDIII-2 p/f	B. Clayton RIII
ACRS (10)	C. McCracken
M. Gamberoni	S. West

Dear Mr. Farrar:

SUBJECT: REVIEW OF COMMONWEALTH EDISON COMPANY'S PROPOSED FIRE BARRIER TESTING PROGRAM (TAC NOS. M85563 AND M85564)

By letter dated June 2, 1994, you responded to our May 18, 1994, request for additional information. The staff has reviewed your response regarding the LaSalle County Station and determined that sufficient information was not provided to address our concerns regarding testing laboratory independence or to justify your position for testing a single cable tray fire barrier enclosure in lieu of a multiple cable tray enclosure. Enclosed are our comments and request for additional information regarding the proposed testing program. If you have any questions, please contact me at (301) 504-1333.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

Original Signed By:

Anthony T. Gody, Jr., Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Enclosure:
Comments and Request for
Additional Information

cc w/enclosure:
See next page

OFC	LA: PDIII-2	PM: PDIII-2	D: PDIII-2
NAME	C MOORE	AGODY AT	RCAPRA R
DATE	6/22/94	6/22/94	6/22/94
COPY	(YES/NO)	(YES/NO)	(YES/NO)

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NAME	CMOORE	AGODY AT	RCAPRA
DATE	6/22/94	6/22/94	6/22/94
COPY	YES/NO	YES/NO	YES/NO

Mr. D. L. Farrar
Commonwealth Edison Company

LaSalle County Station
Unit Nos. 1 and 2

cc:

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REVIEW OF PROPOSED FIRE BARRIER TESTING PROGRAM
LASALLE COUNTY STATION UNITS 1 AND 2
COMMONWEALTH EDISON COMPANY
DOCKET NOS. 50-373 AND 50-374
COMMENTS AND REQUEST FOR ADDITIONAL INFORMATION

- I. Commonwealth Edison Company's (CECo) response to question 1 of NRC letter dated May 18, 1994.

CECo indicated that the Faverdale Technology Centre demonstrated its independence as a test facility in order to attain accreditation from the National Measurement Accreditation Service (NAMAS).

Please provide an explanation of this accreditation process and how it confirms that independence is maintained.

In addition, CECo indicated that Transco will provide its own independent quality review of all items associated with this test program and that CECo will have a qualified fire protection engineer (FPE) available during all phases of the fire test. From CECo's response it is not clear what role the FPE will have regarding monitoring quality of the installation and evaluating potential fire barrier design and testing technical issues.

Please explain what responsibilities and controls the FPE has over this testing program.

- II. CECo's response to question 3 of NRC letter dated May 18, 1994.

- a. In the June 2, 1994, response to NRC questions, CECo indicated that it considers the single 4"x 30" tray sufficient to bound the in-plant two 4"x 30" tray stack configuration which will be enclosed in a single fire barrier system. CECo's justification for this position is that structural integrity of the envelop is more severe in the horizontal position than joints in the vertical position. The staff does not fully agree with this justification. Based on the staff's experience with other fire barrier products and their expected performance under fire test conditions, the staff agrees that horizontal spans of raceway fire barrier systems have the tendency to open at the joints. The staff's experience also indicates that the long vertical spans may have the tendency to separate at the horizontal upper seam as a result of the dead weight of the fire barrier material and the fire related degradation of this material during the fire test. In addition, longer span type vertical fire barrier surfaces have the tendency to be structurally challenged by the impact of the hose stream test. CECo's proposal to test a single 4"x 30" cable does not appear to represent the intended in-plant fire barrier application. CECo did not provide technical justification that the structural performance of the multi-cable tray in-plant fire barrier system can be determined from a single cable tray enclosure fire test.

II. CECO's response to question 3 of NRC letter dated May 18, 1994 (Continued)

The staff, in Supplement 1 to Generic Letter (GL) 86-10, "Fire Endurance Test Criteria for Fire Barrier Systems Used to Separate Redundant Safe Shutdown Trains Within the Same Fire Area," specified that the test specimen should be representative of the plant conditions and that the test program should encompass or bound the raceway sizes and the various configurations for those barriers installed in the plant.

Based on its review of your program, the staff does not consider the proposed cable tray fire barrier test configuration to be representative of the proposed field condition.