Commonwealth Edison Company 1400 Opus Place Downers Grove, IL 60515

August 28, 1995

U. S. Nuclear Regulatory Commission

Attn: Document Control Desk Washington, D. C. 20555



SUBJECT: LaSalle County Nuclear Power Station Units 1 and 2

ComEd Response to NRC Request For Additional Information resulting from a ComEd/NRC Teleconference held on August 1, 1995 in regards

to the Darmatt KM-1 Installation

NRC Docket Nos. 50-373 and 50-374

REFERENCE: June 2, 1995, R. Querio letter to USNRC on the same subject.

In the conference call with the NRC held on 8/1/95, questions were asked and/or information requested by the NRC as a part of their review of the Referenced document. In response to the NRC's questions, ComEd provides the following response.

### Question No. 1 requested the following:

Does the installation procedure previously provided to the NRC, that applies to LaSalle, still need to be considered proprietary?

Response: No, the installation procedure TIQAP 9.20 LS is no longer considered a

proprietary document. The attached affidavit documents the change in

the disclosure condition for this procedure.

## Question No. 2 requested the following:

Provide the thickness and density on the ceramic fiberboard.

Response: The thickness of the ceramic fiberboard is 20mm(0.79 in). The density

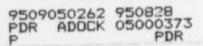
of the ceramic fiberboard ranges from 13-18 lbs/ft2.

# Question No. 3 requested the following:

Specify the length of the conduit shown on Drawing 310106 / DSK 03, included with the test report.

Response: Drawing 310106 / DSK 03 shows two lengths of conduit. The upper

conduit is 72 " in length, of which 36 3/4" was covered and protected within the wrapped two sided cable tray and 35 1/4" was individually wrapped with the Darmatt KM-1. The lower conduit is 38" in length.





### Question No. 4 requested the following:

Provide a clearer/enlarged set of drawings which have more detail of the test specimen.

Response: Enclosed are the requested drawings that apply to the Darmatt KM-1 fire

### Question No. 5 requested the following:

Provide information as to how the air drop was protected in the qualification test.

Response:

In the LaSalle Qualification Test, the air drop conduit and junction box were located and installed in close proximity to the protected cable tray, as shown in the isometric detail on drawing 310106/DSK 03 and in the photograph (Frame 7), on page 73 of 91. The air drop was protected by installing two layers of Darmatt KM-1 boards over the conduit and attaching the board to the cable tray fire barrier wrap as shown in the photograph (Frame 13), on page 79 of 91. This installation was done in the same manner as the Darmatt that was installed on the cable tray. The cable tray was protected on all four sides with the Darmatt KM-1.

In the LaSalle in plant installation, the air drop conduit was not located and installed in as close proximity to the protected cable tray as in the LaSalle Qualification Test. Therefore, the air drop conduit was protected in the same manner as the "boxed in" sections of conduit runs in the qualification test, as shown on drawing 310106/DSK 05, Section C-C (i.e., angle steel framework was attached to the wall and the framework was used to support the Darmatt KM-1 material). The as installed configuration is shown on Detail 1 and the "View On Arrow R" of installation drawing 650345-1B-07, Sheet 2. "Arrow R" is shown on the Layout of Insulated Raceways on drawing 650345-1B-01. The configuration of the as installed Darmatt KM-1 on the air drop conduit is bounded by the LaSalle Qualification Test.

### Question No. 6 requested the following:

Provide clarification regarding the basis for averaging of thermocouples #74-86 instead of averaging #74-81 and #82-86 as two separate groupings, for the 3/4" conduit, mounted to the concrete ceiling.

Response:

This conduit is shown in the isometric detail on Drawing 310106/DSK 03 and in the section detail on Drawing 310106-DSK 02. The total conduit length as shown on the DSK 03 is 72". Of this, 36 3/4" was covered and protected within the wrapped two sided cable tray enclosure which is represented by thermocouples #82-86. The remaining portion was individually wrapped with the Darmatt KM-1 as shown on the isometric details on Drawing 310106/DSK 04, which is represented by thermocouples #74-81.

Following the test, the thermocouple readings of the entire length of bare #8 copper conductor was averaged since there was no internal thermal plug placed within the conduit and since there was no change in the conduit geometry that would require separate averages to need to be determined. The overall temperature averages were 156 °F at 60 minutes and 169 °F at 66 minutes for the entire 72" length of the conduit.

When the thermocouples are grouped based on changes in Darmatt KM-1(ie., protection system) geometry, the average temperature is 143 °F at 60 minutes and 153 °F at 66 minutes for thermocouples #74-81, which represents the conduit individually wrapped with the Darmatt KM-1. The average temperature is 177 °F at 60 minutes and 194 °F at 66 minutes for thermocouples #82-86, which represents the conduit portion covered by the wrapped cable tray. With this thermocouple grouping, in all cases the acceptance criteria of Generic Letter 86-10, Supplement 1 was satisfied.

To the best of my knowledge and belief, the statements contained above are true and correct. In some respect these statements are not based on my personal knowledge, but obtained information furnished by other Commonwealth Edison employees, contractor employees, and consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

Nuclear Licensing Administrator

#### Attachments

cc: H. J. Miller - Regional Administrator, Region III

R. M. Latta - Project Manager, NRR

P. G. Brochman, Senior Resident Inspector - LaSalle County Station

Office of Nuclear Facility Safety - IDNS

#### TRANSCO PRODUCTS INC.

#### **AFFIDAVIT**

I, Robert M. Goss, being duly sworn, depose and state as follows:

- (1) I am President of Transco Products Inc. (Transco) and have reviewed the confidential commercial information described in TIQAP 9.20 LS, which had been previously withheld from disclosure and where such withholding is no longer required.
- (2) The information previously withheld was developed for ComEd, pertaining directly to the resolution of the Thermo-Lag issue at LaSalle Co. Station. Transco is the owner of the confidential commercial information. Specifically this information is installation procedure TIQAP 9.20 LS.
- (3) In establishing previously, the need to withhold such confidential commercial information, Transco had relied on the exemption from disclosure set forth in the Freedom of Information Act (FOIA), 5 USC § 552 (b) (4), and NRC Regulations 10 CFR §§ 9.17(a) (4), and 2.790 (a) (4) for "commercial or financial information obtained from a person and privileged or confidential" (Exemption 4). Upon further review, this confidential commercial information no longer needs to be withheld from disclosure under 10 CFR § 2.790 (b) (4).

State of Illinois	)	ss. Mag. In No	_
County of Cook	)	ss: Jegy h Da	

Robert M. Goss, being duly sworn, deposes and says:

That he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information and belief.

Executed at Chicago, Illinois, this 10th day of August, 1995.

Robert M. Goss

President

Subscribed and sworn before me this 10 day of Grand 1995.

"OFFICIAL SEAL"
PEGGY M. DAMM
Notary Public, State of Illinois
My Commission Expires 3-3-98