

September 28, 1995

Mr. J. E. Cross
Senior Vice President and
Chief Nuclear Officer
Nuclear Power Division
Duquesne Light Company
Post Office Box 4
Shippingport, PA 15077

SUBJECT: RESPONSES TO REQUESTS FOR ADDITIONAL INFORMATION (RAI) REGARDING NRC
GENERIC LETTER (GL) 92-08, BEAVER VALLEY POWER STATION, UNIT 2
(TAC NO. M85517)

Dear Mr. Cross:

By letters dated December 22, 1994, and March 23, 1995, Duquesne Light Company (DLC) provided responses to the NRC staff's RAIs dated September 23, 1994, and December 23, 1994, respectively regarding NRC GL 92-08, "Thermo-Lag 330-1 Fire Barriers." The NRC staff has reviewed DLC's responses and on the basis of our review, we have determined that DLC's responses to the RAIs are incomplete. The specific areas where we have found DLC's responses to be incomplete are discussed in the enclosed follow-up RAI.

The information requested in the enclosed follow-up RAI is required for us to complete our review of this issue for Beaver Valley Power Station, Unit 2, in a timely manner. Therefore, DLC is requested to respond to this follow-up RAI within 60 days of receipt of this letter.

This requirement affects nine or fewer respondents and, therefore, is not subject to the Office of Management and Budget review under P.L. 96-511.

Sincerely,

/s/

Donald S. Brinkman, Senior Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-412

Enclosure: Follow-up RAI

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in cursive script that reads "Donald S. Brinkman".

Donald S. Brinkman, Senior Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-412

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J. E. Cross
Duquesne Light Company

Beaver Valley Power Station
Units 1 & 2

cc:

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FOLLOW-UP REQUEST FOR ADDITIONAL INFORMATION (RAI)
REGARDING RESPONSES TO GENERIC LETTER (GL) 92-08
"THERMO-LAG 330-1 FIRE BARRIERS"
BEAVER VALLEY POWER STATION, UNIT 2
DOCKET NO. 50-412

1.0 RAI OF SEPTEMBER 23, 1994

In the RAI of September 23, 1994, the NRC staff requested information regarding important barrier parameters, Thermo-Lag barriers outside the scope of the NEI program, ampacity derating, alternatives, and schedules.

In its submittal of December 22, 1994, the licensee asserted that there are unresolved technical issues in the ampacity derating area. The licensee also stated that an evaluation which had been performed for the applicable cables indicated that there was sufficient margin to accommodate the higher derating factors associated with the values referenced in GL 92-08. In addition, the licensee would follow developments for this long-term issue through the Nuclear Energy Institute (NEI).

During a public meeting on March 14, 1995, with the licensees for the four lead plants for the resolution of Thermo-Lag issues, the NRC staff responded to the question, "Will the resolution of the ampacity derating concern be deferred until agreement is reached on the appropriate testing protocol (i.e., IEEE Standard P848)?" The NRC staff reiterated its position, which was previously stated in the September 23, 1994 RAI, that the ampacity derating concern could be resolved independently of the fire endurance concerns. After a review of the tests performed under the draft IEEE Standard P848, the NRC staff transmitted comments which were designed to ensure the repeatability of test results to the IEEE working group responsible for the test procedure. At this time, the NRC staff is not aware of any NEI initiative to address the ampacity derating issue. The licensee is requested to submit its ampacity derating evaluations, including any applicable test reports, in order to provide an adequate response to GL 92-08 reporting requirement 2(c).

2.0 RAI OF DECEMBER 23, 1994

In the RAI of December 23, 1994, the NRC staff requested information describing the examinations and inspections that will be performed to obtain the important barrier parameters for the Thermo-Lag configurations installed at Beaver Valley Power Station. The licensee did not provide any information regarding ampacity derating in its submittal of March 23, 1995.

On May 18, 1995, members of the NRC staff held a telephone conference call with NEI representatives on ampacity derating issues for Thermo-Lag fire barriers. The NRC staff indicated that the latest IEEE Standard P848 draft procedure can be used by licensees or NEI as the basis for an ampacity derating test program. The note dated May 22, 1995, which documents the subject telephone conference meeting, is attached for your information. In addition, a copy of a safety evaluation attached to a June 14, 1995, letter to C. Lance Terry of TU Electric was sent to Duquesne Light Company and to those licensees who rely on Thermo-Lag installations.

Please submit prior to the final resolution of the Thermo-Lag 330-1 issue a description of the anticipated analytical methodology including typical calculations which will be used to determine the ampacity derating parameters for the Thermo-Lag fire barriers that are installed at Beaver Valley Power Station, Unit 2.

Attachment: Note to Brian W. Sheron, NRR, NRC, from Carl H. Berlinger, NRR, NRC, Subject: Memorandum of Record dated May 22, 1995

May 22, 1995

NOTE TO: Brian W. Sheron, Director, DE, NRR

FROM: Carl H. Berlinger, Chief, EELB, DE, NRR

SUBJECT: MEMORANDUM OF RECORD

On May 18, 1995, members of the NRC staff (B. Sheron, C. Berlinger, P. Gill, M. Gamberoni and R. Jenkins) held a telephone conference call with Mr. Alex Marion and Mr. Biff Bradley of the Nuclear Energy Institute (NEI) on ampacity derating issues for Thermo-Lag fire barriers. Mr. Marion contacted the staff regarding two topics: (1) Status of the Safety Evaluation (SE) on the Comanche Peak Steam Electric Station (CPSES), Unit 2 Ampacity Derating Test Program; and (2) Staff Acceptance of the IEEE Standard P848, "Procedure for the Determination of the Ampacity Derating of Fire Protected Cables."

Dr. Berlinger stated that the subject SE for CPSES 2 had been completed and we expected that it will be transmitted to the licensee within the next two weeks. Dr. Berlinger agreed to notify Mr. Marion by phone after the SE had been issued by the staff. Due to potential generic applications the staff will provide a copy of the CPSES, Unit 2 SE to licensees with Thermo-Lag fire barriers.

The staff has been interfacing with the IEEE Task Force responsible for IEEE P848 over the last 2 years to improve the subject procedure. This effort has resulted in recent revisions to the subject procedure which addressed the majority of the concerns raised by EELB (reference: Letter dated 10/13/94 from C. Berlinger to A. K. Gwal). Although not all of the concerns were addressed by the IEEE Task Force Dr. Berlinger indicated that the latest IEEE P848 draft procedure can be used by licensees or NEI as the basis for an ampacity derating test program. The latest procedure revision (Draft 16) addresses the major test concerns regarding inductive heating and conduit surface emissivities effects.

The staff emphasized that licensees should submit the actual test procedures or plans to the staff for comment. After discussion of the various options to develop a generic test program NEI agreed to review the CPSES 2 SE and then contact the staff as necessary for further discussions or questions on this matter.

cc: Alex Marion, NEI

CONTACT: Ronaldo Jenkins, EELB/DE
415-2985

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