

October 23, 1995

Mr. Donald F. Schnell
Senior Vice President - Nuclear
Union Electric Company
Post Office Box 149
St. Louis, MO 63166

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING GENERIC LETTER 92-08
(TAC NO. M85530)

The staff has reviewed Union Electric Company's responses of December 19, 1994, March 28, 1995, and June 26, 1995, to the requests for additional information (RAI) of September 19, 1994, and December 28, 1994, regarding Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers," as it pertains to the Callaway Plant, Unit No. 1. As a result of the review, the staff has determined that additional information is needed to fully address the questions raised in the RAIs. The information needed is detailed in the enclosure.

To assist the NRC staff in meeting its review schedule, we request that you respond to the RAI in writing within 45 days of receipt of this letter.

The requirements affect nine or fewer respondents and, therefore, are not subject to the Office of Management and Budget review under P.L. 96-511. If you have any questions, please contact me at 301-415-1362.

Sincerely,

ORIGINAL SIGNED BY:
Kristine M. Thomas, Project Manger
Project Directorate IV-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure: Request for Additional
Information

cc w/encl: See next page

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Mr. D. F. Schnell

- 2 -

cc w/encl:

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CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

FOLLOWUP REQUEST FOR ADDITIONAL INFORMATION REGARDING

GENERIC LETTER 92-08

THERMO-LAG 330-1 FIRE BARRIERS

1. REQUEST FOR ADDITIONAL INFORMATION (RAI) OF SEPTEMBER 19, 1994

In the RAI of September 19, 1994, the NRC staff requested information regarding important barrier parameters, Thermo-Lag barriers outside the scope of the Nuclear Energy Institute (NEI) program, ampacity derating, alternatives, and schedules.

In your submittal of December 19, 1994, you asserted that there are unresolved technical issues in the ampacity derating area. You indicated that you expect the Thermo-Lag fire barriers for conduit and cable tray assemblies will be bounded by the NEI test program. In the event that the NEI fire barrier tests indicate the need to upgrade existing in-plant barriers or to replace existing Thermo-Lag barriers, NEI is expected to provide valid ampacity derating parameters for the modified design.

During a public meeting on March 14, 1995, with the licensees for the four lead plants for the resolution of Thermo-Lag issues, the 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., Institute of Electrical and Electronics Engineers (IEEE) P848)?" The staff reiterated its position, previously stated in the September 1994, RAI, that the ampacity derating concern could be resolved independently of the fire endurance concerns. After reviewing the tests performed under the draft IEEE Standard P848, the staff sent the IEEE working group responsible for the test procedure some comments designed to ensure the repeatability of test results. At this time the staff is not aware of any existing or planned NEI initiative that will address the ampacity derating issue. You are requested to submit your ampacity derating evaluations, including any applicable test reports, in order to provide an adequate response to Generic Letter 92-08 Reporting Requirement 2(c).

2. REQUEST FOR ADDITIONAL INFORMATION OF DECEMBER 28, 1994

In the RAI of December 28, 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 the Callaway Plant. You did not provide any information regarding ampacity derating in your submittal of March 28, 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 staff indicated that the latest IEEE P848 draft procedure can be used by licensees or NEI as the basis for an ampacity derating test program. NEI agreed to review the Comanche Peak Steam Electric Station, Unit 2 Safety Evaluation (SE) in order to develop a generic test program. The memorandum dated May 22, 1995, which documents the subject telephone conference meeting, is attached for your information. In addition, a copy of the subject SE dated June 14, 1995, was sent to those licensees that rely on Thermo-Lag installations.

In your submittal of June 26, 1995, you stated that you agree with the NEI position that the performance of chemical composition testing alone will provide the basis to use generic test data with respect to ampacity derating. The results from the chemical testing program for Callaway's samples indicate that the material installed at Callaway is consistent with that tested by NEI during the Thermo-Lag fire endurance tests. As such, unless significant anomalies occur during the remainder of the organic and inorganic testing outlined above, you consider the material installed at Callaway to be acceptable from the standpoint of ampacity derating.

In your submittal of June 26, 1995, you referred to an NEI position stating that chemical composition test results alone can be used to provide the basis for the application of generic test data. Please provide a technical basis for the NEI position as it applies to the ampacity derating area and forward a copy of any supporting documentation for staff review.

You are requested to provide your site-specific schedule and plans for the resolution of the ampacity derating issue for Thermo-Lag fire barriers. If you expect to use an NEI test program or analysis, please provide specific program details and incorporate any input by NEI into your overall schedule. The staff expects that, in resolving fire endurance issues, you will submit the test procedures or, alternatively, describe the analytical methodology, including typical calculations, that will be used to determine the ampacity derating parameters for the Thermo-Lag fire barriers that are installed at the Callaway Plant.

Attachment: Memorandum of 5/22/95

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