



PECO ENERGY

PECO Energy Company  
Nuclear Group Headquarters  
965 Chesterbrook Boulevard  
Wayne, PA 19087-5691

November 6, 1995

Docket Nos. 50-277  
50-278  
50-352  
50-353License Nos. DPR-44  
DPR-56  
NPF-39  
NPF-85U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555Subject: Peach Bottom Atomic Power Station, Units 2 and 3,  
Limerick Generating Station, Units 1 and 2,  
Request for Additional Information Regarding  
Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers"

- References:
- 1) Letter from G. A. Hunger, Jr. to USNRC  
Document Control Desk dated April 16, 1993
  - 2) Letter from G. A. Hunger, Jr. to USNRC  
Document Control Desk dated December 29, 1993
  - 3) Letter from G. A. Hunger, Jr. to USNRC  
Document Control Desk dated February 4, 1994
  - 4) Letter from G. A. Hunger, Jr. to USNRC  
Document Control Desk dated December 19, 1994
  - 5) Letter from G. A. Hunger, Jr. to USNRC  
Document Control Desk dated March 29, 1995
  - 6) Letter from G. A. Hunger, Jr. to USNRC  
Document Control Desk dated August 2, 1995

Dear Sirs:

The subject request for additional information (RAI) regarding Generic Letter (GL) 92-08, "Thermo-Lag 330-1 Fire Barriers," dated May 30, 1995, requested that PECO Energy Company, (PECO Energy), respond in a timely manner with additional information regarding Thermo-Lag 330-1 fire barrier systems. PECO Energy had previously responded on April 16, 1993 (reference letter 1), December 29, 1993 (reference letter 2), February 4, 1994 (reference letter 3), December 19, 1994 (reference letter 4), and March 29, 1995 (reference letter 5) to this GL. In addition, PECO Energy responded (reference letter 6) that we were participating with numerous other utilities in a chemical testing program coordinated by the Nuclear Energy Institute (NEI). PECO Energy contributed 21 samples of Thermo-Lag material to the program.

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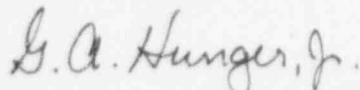
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The program consisted of pyrolysis gas chromatography evaluation of 169 samples from the participating utilities to assess organic composition, and energy dispersive x-ray spectroscopy of 33 samples to assess inorganic chemical composition. The sample population consisted of materials manufactured between 1982 and 1995. On the basis of the above tests, the test laboratory, NUCON International, Inc., concluded that all samples contained the constituents identified by Thermal Sciences Inc., as essential to fire barrier performance. NUCON also determined that the composition of the sample population was consistent. A copy of the summary report from NUCON is to be provided to the NRC by NEI.

The PECO Energy samples were consistent with the other utility samples. The summary pages of the NUCON reports for PECO Energy samples are contained in Attachment 1. PECO Energy believes that the high degree of chemical consistency adequately demonstrates that the materials installed at PBAPS and LGS are functionally equivalent to materials tested in the industry fire endurance tests. The consistent chemical test results from the broad population of Thermo-Lag represented also validates our position that 21 samples are sufficient. PECO Energy does not plan to conduct any additional chemical composition testing.

If you have any questions please feel free to contact us.

Very truly yours,



G. A. Hunger, Jr.,  
Director - Licensing

Attachment

cc: T. T. Martin, Administrator, Region I, USNRC  
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS  
N. S. Perry, USNRC Senior Resident Inspector, LGS

COMMONWEALTH OF PENNSYLVANIA

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ss.

COUNTY OF CHESTER

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Drew B. Fetters, being first duly sworn, deposes and says:

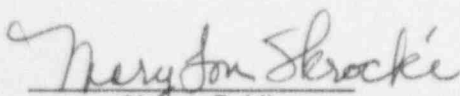
That he is Vice President of PECO Energy Company; that he has read the attached response to the Request for Additional Information regarding Generic Letter 92-08 for Peach Bottom Facility Operating Licenses DPR-44 and DPR-56, and Limerick Facility Operating Licenses NPF-39 and NPF-85, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

  
Vice President

Subscribed and sworn to

before me this 6<sup>th</sup> day

of November 1995.

  
Notary Public

Notarial Seal  
Mary Lou Skrocki, Notary Public  
Tredyffrin Twp., Chester County  
My Commission Expires May 17, 1999

Member, Pennsylvania Association of Notaries