



ENTERGY

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Director
Nuclear Safety
Waterford 3

W3F1-95-0176

A4.05

PR

November 9, 1995

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Additional Follow-up to the Request for Additional
Information (RAI) Regarding Generic Letter 92-08,
Issued Pursuant to 10 CFR 50.54(f) Dated December 29,
1994 (TAC NO. M85621)

Gentlemen:

Entergy Operations, Inc. issued a letter (W3F1-95-0108) dated August 4, 1995 to the Nuclear Regulatory Commission (NRC) in follow-up response to the Commission's Request for Additional Information (RAI) dated December 29, 1994. In the August 4, 1995 Entergy Letter, Waterford 3 committed to provide the NRC with a supplemental report within 60 days of receipt of a pending NUCON updated (Thermo-Lag chemical composition test) report. The December 29, 1994 NRC letter required that a supplemental report be submitted that confirms completion of the (Thermo-Lag composition) testing and provide results of the test and analyses. The supplemental report is also required to describe any changes to previously submitted plans or schedules that result from the recent tests or analyses.

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Additional Follow-up to the Request for Additional Information (RAI)
Regarding Generic Letter 92-08, Issued Pursuant to 10 CFR 50.54(f) Dated
December 29, 1994 (TAC NO. M85621)

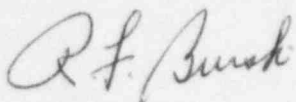
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Waterford 3 received updated test results and analysis information from
NUCON on September 12, 1995. Attached is the required supplemental report.
If you have any questions concerning the attached report, please contact
Mr. O.P. Pipkins at (504) 739-6707.

Very truly yours,



R.F. Burski
Director
Nuclear Safety

RFB/OPP/ssf
Attachments

cc: (w/Attachments)
L.J. Callan, NRC Region IV
C.P. Patel, NRC-NRR
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office

ATTACHMENT No. 1

SUPPLEMENTAL REPORT

ON

WATERFORD 3

THERMO-LAG APPLICATIONS

FOLLOW-UP REPORT
TO THE REQUEST FOR ADDITIONAL INFORMATION (RAI)
REGARDING GENERIC LETTER 92-08
ISSUED PURSUANT TO 10 CFR 50.54(f)

This report is being offered in response to the NRC December 29, 1994 (TAC NO. M85621) request for additional information, which required that a supplemental report be submitted to the NRC, confirming completion of the (Thermo-Lag chemical composition) testing and providing results of the test and analyses. This supplemental report also contains a discussion of the lack of any significant changes to the final Engineering evaluation conclusions previously submitted (W3F1-94-0220 dated December 21, 1994) by Waterford 3 to the NRC.

As summarized in earlier submittals, Waterford 3 currently has only seven applications of Thermo-Lag in the plant. None of the seven applications are protecting electrical components or raceways. Each of the Thermo-Lag applications protect short sections of HVAC duct, providing what amounts to (in each case) an extension of a 3 hour (wall) fire barrier to the fire damper located in the duct (a short distance outside of the barrier) penetrating the barrier. The Thermo-Lag installations compensate for having the dampers located outside of the fire barriers.

Waterford 3 has received the updated report of the results of the (Thermo-Lag chemical composition) testing from the contracted independent test laboratory (NUCON). The test results conclude that the Thermo-Lag samples are consistent with other Thermo-Lag samples in terms of chemical composition. One of the three samples (0395-37B) had disproportionate amounts of characteristic compounds. Another sample (0395-37C) had a larger quantity of organic phosphate compounds than the other Thermo-Lag samples. The complete NUCON test report is attached, providing results of the test and analyses.

In Entergy's December 21, 1994 response (W3F1-94-0220), it was stated that the Engineering evaluation had been completed. The Entergy response further stated that results of the Engineering evaluation concluded that the installed configuration was acceptable. A summary of supporting basis for that determination was provided in that response. The results of the recent required (chemical composition) testing of Waterford 3 Thermo-Lag by an independent test laboratory (NUCON) have not impacted the above stated conclusion. A copy of the updated Generic Letter 86-10 evaluation is attached.

Based on the results of the updated Generic Letter 86-10 evaluation (attached), Waterford 3 has determined that the seven Thermo-Lag fire damper duct applications are to be dispositioned as "accept-as-is" with no necessary modifications. Sections of the Thermo-Lag installations that were disturbed to obtain samples for destructive testing will be repaired. Since the results of the Engineering evaluations determine that the effective fire protection provided by the affected fire barrier sections are at least equivalent to three hours of fire barrier protection, prior NRC approval is not required. Waterford 3 will therefore discontinue the imposed compensatory actions since the actions are no longer necessary. Supporting calculation packages, drawings and evaluations are available at Waterford 3 for future NRC audits and inspections.

ATTACHMENT No. 2

NUCON INTERNATIONAL, INC.

PROLYSIS GAS CHROMATOGRAPHY

ANALYSIS OF 3 THERMO-LAG

FIRE BARRIER SAMPLES