



**CENTERIOR
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Docket Number 50-346

License Number NPF-3

Serial Number 2339

November 8, 1995

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Subject: Response to Follow-up Request for Additional Information
Regarding Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers"
(TAC No. 85542)

Ladies and Gentlemen:

The Nuclear Regulatory Commission (NRC) issued Generic Letter 92-08 on December 17, 1992 (Toledo Edison Log Number 3916). Toledo Edison (TE) responded, as applicable for the Davis-Besse Nuclear Power Station (DBNPS), on April 16, 1993 (TE Serial Number 2132). The NRC issued subsequent requests for additional information regarding Generic Letter 92-08 on December 21, 1993 (TE Log Number 4125), September 15, 1994 (TE Log Number 4398), and December 23, 1994 (TE Log Number 4464). Toledo Edison responded on February 11, 1994 (TE Serial Number 2201), December 8, 1994 (TE Serial Number 2258), and March 22, 1995 (TE Serial Number 2282), respectively. In addition, a comprehensive update of TE's current progress and plans regarding Thermo-Lag 330-1 fire barrier issues was provided on June 13, 1995 (TE Serial Number 2298).

On October 18, 1995, TE received a follow-up request for additional information regarding ampacity derating parameters for the installed Thermo-Lag fire barriers. Specifically, TE was requested to provide the NRC, within 30 days of receipt of the request, a schedule for submitting 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.

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The June 13, 1995 letter described the various approaches under consideration to achieve Appendix R compliance for Thermo-Lag 330-1 fire barrier concerns, including raceway, radiant energy shields, and structural steel applications. The letter further stated that an approach would be established by June, 1996, and described activities which would be completed in order to support this schedule. As also stated in the letter, based on plant-specific calculations which used ampacity derating factors provided by the Thermo-Lag 330-1 manufacturer, ampacity derating is not expected to be a concern for power cable circuits protected by Thermo-Lag 330-1 at DBNPS, even if significant adjustments to the ampacity derating factors previously provided by the vendor need to be applied.

Toledo Edison recognizes that ampacity derating is a consideration for whatever choice of approach is utilized to achieve Appendix R compliance, and that the plant-specific calculations will need to be revised. Toledo Edison will establish an approach for addressing the ampacity derating issue, in parallel with the overall Appendix R resolution strategy. Accordingly, Toledo Edison expects to be able to submit 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, by June 30, 1996.

If you have any questions, please contact Peter W. Smith, acting Manager - Regulatory Affairs, at (419) 249-2366.

Very truly yours,



MKL/laj

cc: L. L. Gundrum, NRC/NRR DB-1 Project Manager
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