

**PERRY NUCLEAR POWER PLANT**

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Perry Nuclear Power Plant

Docket No. 50-440

Update to the Response to the Followup Request for Additional Information Regarding Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers" - Ampacity Derating Issue

References:

1. PNPP response to Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers," letter PY-CEI/NRR-1638L, dated April 16, 1993.
2. PNPP response to the Request for Additional Information Regarding Generic Letter 92-08, letter PY-CEI/NRR-1750L, dated February 11, 1994.
3. PNPP response to the Followup to the Request for Additional Information Regarding Generic Letter 92-08, Issued Pursuant to 10CFR50.54(f), letter PY-CEI/NRR-1886L, dated December 15, 1994.
4. PNPP response to the Followup to the Request for Additional Information Regarding Generic Letter 92-08, Issued Pursuant to 10CFR50.54(f), letter PY-CEI/NRR-1926L, dated March 22, 1995.
5. PNPP update to the response to the Followup Request for Additional Information Regarding Generic Letter 92-08, letter PY-CEI/NRR-1966L, dated June 28, 1995.

Gentlemen:

The Cleveland Electric Illuminating (CEI) Company responded to a December 23, 1993, NRC Followup Request for Additional Information (RAI) regarding Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers," via Reference 2, and to a second followup request via Reference 3. These responses stated that there were unresolved technical issues associated with the resolution of the ampacity derating issue and provided a preliminary conclusion that the load versus ampacity margin for circuits protected by Thermo-Lag 330-1 was equal

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to or greater than 29%. As stated in the October 4, 1995, "Response to the Request for Additional Information Regarding Generic Letter 92-08," the NRC has concluded that there are no longer any unresolved technical issues and that the ampacity derating concern can be resolved independently of the fire endurance concerns. The NRC has requested resolution of this issue by the licensees.

CEI received a specific request dated October 4, 1995, for resolution of the ampacity derating issue for Perry. In that request, the NRC indicated that CEI had referred to a site specific evaluation in the December 15, 1994, submittal and requested a copy of this evaluation if it represented the final determination of ampacity derating parameters. CEI discussed "preliminary calculations based on conservative assumptions" in the February 11, 1994, submittal; however, a site specific evaluation related to ampacity derating was not discussed in either the February 11, 1994, or the December 15, 1994, submittals. The 29% ampacity derate margin discussed in these two letters was based on conservative assumptions, but it should not be considered the final determination of ampacity derating parameters for the Perry plant.

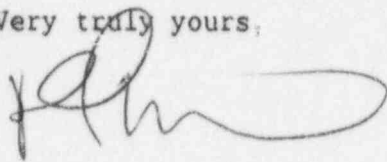
An evaluation, based on the Texas Utilities/Nuclear Energy Institute (NEI) methodology, is being performed on the existing Thermo-Lag installations at Perry, utilizing site specific parameters. Preliminary results indicate that there continues to be adequate margin for continuously energized power cables in both conduits and in cable trays currently wrapped in Thermo-Lag 330-1. Only one raceway configuration has been identified which falls outside of the Texas Utilities/NEI test methodology. There are three continuous power applications which utilize this raceway configuration. The concern with this configuration is expected to be resolved either through analysis or modifications to preclude the necessity for additional testing.

As stated in the CEI submittal dated March 22, 1995, the review of the safe shutdown analysis, currently in progress, will result in the identification of the cable trays and conduits requiring fire rated barriers for the protection of the redundant train of safe shutdown equipment. This review is expected to result in changes to the existing Thermo-Lag barrier configurations. The site specific ampacity derate evaluation will be updated to reflect these changes and to ensure that adequate ampacity derate margin continues to be available. The ampacity derating issue will be resolved for Perry in conjunction with the overall 10 CFR 50, Appendix R, Thermo-Lag 330-1

resolution discussed in References 1-5. CEI will submit the analytical methodology, including typical calculations, used to determine the ampacity derating parameters by June 30, 1996. CEI will also submit any test procedures used in this endeavor.

If you have questions or require additional information, please contact Mr. James D. Kloosterman, Manager - Regulatory Affairs, at (216) 280-5833.

Very truly yours,



DCS:KRJ

Attachment

cc: NRC Project Manager  
NRC Resident Inspector Office  
NRC Region III