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John F. Franz, Jr.  
Vice President, Nuclear

December 1, 1995  
NG-95-3362

Mr. William T. Russell, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-37  
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center  
Docket No: 50-331  
Op. License No: DPR-49  
Follow-up Information in Response to NRC Generic Letter 92-08

Reference: 1) Letter, Franz (IES) to Russell (NRC), dated June 30, 1995,  
NG-95-2074  
2) Letter, Franz (IES) to Russell (NRC), dated September 1, 1995,  
NG-95-2644

File: A-101a, P-72a

Dear Mr. Russell:

This letter provides further information regarding resolution of Thermo-Lag installations at the Duane Arnold Energy Center (DAEC). The attachment to this letter contains summary information updating the plans and schedules originally communicated in References 1 and 2. Additional information is available at the DAEC for review by your staff.

This letter closes commitments made in Reference 1, Schedule Items 7 through 10 and the commitment made in Reference 2. This letter commits to submitting an exemption request by June 28, 1996.

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An IES Industries Company

Mr. William T. Russell  
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Should you have any questions regarding this matter, please contact this office.

This letter is true and accurate to the best of my knowledge and belief.

IES UTILITIES INC.

By *John F. Franz*  
John F. Franz  
Vice President, Nuclear

State of Iowa  
(County) of Linn

Signed and sworn to before me on this 29<sup>th</sup> day of November, 1995,

by *John F. Franz*

*Kathleen M. Furman*  
Notary Public in and for the State of Iowa  
September 28, 1995  
Commission Expires

Attachment: IES Utilities Integrated Thermo-Lag Resolution Schedule

JFF/LBS/lbs  
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cc: L. Swenzinski  
L. Liu  
B. Fisher  
G. Kelly (NRC-NRR)  
H. Miller (Region III)  
NRC Resident Office  
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## **IES Utilities**

### **Integrated Thermo-Lag Resolution Schedule**

#### **Scope of Alternate Barrier Testing**

In Reference 1, Schedule Item 7, IES committed to providing the scope and schedule of planned alternate material testing. In Reference 2, IES committed to providing this information by December 1, 1995.

IES and Carolina Power and Light (CP&L) are cooperating in a test of the DARMATT KM-1 barrier system supplied by Transco Products, Inc. (Transco). The test configuration is similar to that described during the May 18, 1995 meeting of IES, CP&L and the Washington Public Power Supply System with the NRC. IES intends to use the test data to support installation of DARMATT on drywell electrical penetrations. DARMATT will replace Thermo-Lag on raceway installations 2A-4, 2A-6, 2A-7 and 2A-10. The schedule is to test the DARMATT configuration during the week of December 18, 1995 and to have the final test report by February 28, 1996.

This schedule item is complete.

#### **Fire Area Barrier Modeling Evaluations**

In Reference 1, Schedule Items 8 and 9, IES committed to evaluate the need for Thermo-Lag coating on duct installation SS-9 and fire dampers FD-010, FD-012, FD-013, FD-016, FD-114 and FD-116. Evaluations were made in accordance with Generic Letter 86-10 Fire Area Barrier Guidelines, and it has been determined that fireproofing is not required for these installations. These Thermo-Lag installations will be abandoned in place.

These schedule items are complete.

#### **Field Verification Program**

In Reference 1, Schedule Item 10, IES committed to developing a field verification program for Thermo-Lag installations which will be relied on for Appendix R compliance. This program has been developed using Generic Letter 92-08 and subsequent NRC correspondence as guidance in determining critical attributes for specific applications. As-built data is then gathered for each installation and used to determine the status of the critical attributes. It should be noted that the critical attributes for the different types of installations used at DAEC vary widely. For example, spray on

Thermo-Lag fireproofing used at DAEC has relatively few critical attributes compared to those for raceway barriers.

IES participated in the recent chemical testing program of Thermo-Lag 330-1 performed by the industry. The test results indicate that Thermo-Lag has been consistently formulated and support the use of generic fire tests and other data developed by NEI and others.

IES is currently planning to maintain three Thermo-Lag installations at the DAEC for Appendix R purposes: raceway fire barrier installation 16F-1, fireproofing installation SS-7 and wall installation SS-8. Field verification, as described above, will be performed for these installations.

This schedule item is complete.

#### **Change in Resolution Path for Raceway Barrier Application 16F-1**

IES previously stated that the need for Thermo-Lag installation 16F-1 would be eliminated by completion of plant modifications. Due to low combustible loading in the fire area encompassing 16F-1, the resolution approach has been revised. Field verification will be performed for this installation. IES plans to submit an exemption request for this installation by June 28, 1996. This activity is identified as Schedule Item 13.