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TU ELECTRIC

August 13, 1992

William J. Cahill, Jr.  
 Group Vice President

U. S. Nuclear Regulatory Commission  
 Attn: Document Control Desk  
 Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
 DOCKET NOS. 50-445 AND 50-446  
 RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

REF: NRC letter dated August 3, 1992 from A. Bill Beach to  
 W. J. Cahill, Jr.

Gentlemen:

This is in response to a request for additional information submitted by Reference 1. We have reviewed your questions and the requested information follows.

Question a) What acceptance criteria are being used for corner gap width of Thermo-Lag fire barrier envelopes.

Response: The CPSES criteria for Thermo-Lag fire barrier material does not explicitly provide for or allow "gaps". Specifically, prefabricated panel and conduit section mating surfaces are required to be cut flush and square to achieve the tightest fit physically permitted by the configuration and the material. All seams and joints are pre-caulked (i.e., "buttered") with 1/4" to 1/2" of Thermo-Lag 330-1 trowel grade material. CPSES application procedures provide for the application of trowel grade material at joints and seams (i.e., "corners") which adequately fills minor gap areas that may exist on mating surfaces. The test assemblies prepared and tested to date at Omega Point Laboratories utilized this criteria (as well as configurations installed in Unit 1 and Unit 2) and exhibited no failures attributed to such gaps.

Question b) Is this criteria different from the acceptance criteria used for Unit 1 installations? If yes, please explain.

Response: No.

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Question c) What was the corner gap width acceptance criteria used to fabricate the test assemblies used at Omega Point Labs? Is this criteria different from that used in the Unit 1 and 2 installations? If yes, please explain.

Response: The criteria was the same as described above in response to question a), no.

Question d) Do you have QA/QC data relative to the actual installed corner gap width in the tested assemblies, and as installed in Unit 1 and Unit 2?

Response: Yes, Construction/Quality Procedure CQP-CV-107 requires in-process QC surveillance to ensure that mating surfaces at seams, joints, etc. are adequately pre-caulked with trowel grade material (no gap). Accordingly, QC monitors in-process Thermo-Lag installations to verify this requirement is implemented and documents this surveillance via inspection reports. This same level of verification has been utilized for Thermo-Lag installations in Unit 1, Unit 2 and at Omega Point Laboratories for test assemblies.

Question e) What type filler material is used for filling the gaps during installation? Was the same type filler material used in Unit 1 and in the assemblies tested at Omega Point Labs?

Response: Thermo-Lag 330 trowel grade material was used in both applications (Unit 1 and the test at Omega Point Labs).

Should you have any question or need additional information, contact Obaid Bhatti at (817) 897-5839.

Sincerely,

*William J. Cahill, Jr.*  
William J. Cahill, Jr.

By: *Roger D. Walker*  
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Manager of Regulatory Affairs  
for NEG

OB/tg

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