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Ref. # Generic Letter 92-08
NRC Bulletin 92-01

January 19, 1993

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) - UNIT 2
DOCKET NO. 50-446
RESPONSE TO GENERIC LETTER 92-08 THERMO-LAG
330-1 FIRE BARRIERS

REF:
1) TU Electric letter logged TXX-92331 from W. J. Cahill, Jr., to NRC dated July 9, 1992; Response to NRC Bulletin 92-01
2) TU Electric letter logged TXX-92446 from W. J. Cahill, Jr., to NRC dated September 18, 1992; Response to NRC Bulletin 92-01, Supplement 1
3) TU Electric letter logged TXX-92626 from W. J. Cahill, Jr., to NRC dated December 23, 1992; Evaluation of Thermo-Lag Fire Barrier System
4) TU Electric letter logged TXX-93023 from W. J. Cahill, Jr., to NRC dated January 19, 1993; Thermo-Lag Laboratory Test Result Reports for CPSES Unit 2
5) NRC letter from Thomas A. Bergman to William J. Cahill, Jr., dated September 22, 1992
6) NRC letter from Thomas A. Bergman to William J. Cahill, Jr., dated October 2, 1992

Gentlemen:

Generic Letter 92-08, dated December 17, 1992, stated that all addresses are required, pursuant to section 182(a) of the Atomic Energy Act of 1954, as amended, and 10CFR50.54(f), to submit a written report within 120 days from the date of this generic letter. TU Electric has reviewed the Actions Requested and Reporting Requirements.

The Actions Requested and Reporting Requirements specified in the generic letter and the corresponding responses for CPSES Unit 2 are provided below. The responses for CPSES Unit 1 and the voluntary submittal of impact data are being evaluated and will be submitted at a later date.

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I. ACTIONS REQUESTED

Action 1) Confirm that the Thermo-Lag 330-1 barrier systems have been qualified by representative fire endurance tests.

Response 1) TU Electric has confirmed that the Thermo-Lag barrier systems have been qualified by representative fire endurance tests. The results of the TU Electric tests have been submitted to your staff via reference 3 and reference 4. Additionally reference 4 provides details regarding Engineering Evaluations of untested configuration. TU Electric is in full compliance with this requested action.

Action 2) Confirm that the ampacity derating factors have been derived by valid tests.

Response 2) Engineering Report ER-ME-067, was docketed via TU Electric's letter TXX-92626 dated December 23, 1992 (reference 3). Section 6.0 of this engineering report documents TU Electric's evaluation on ampacity derating factors. This evaluation is based upon the conservative application of the results from several ampacity tests (as referenced in the report) to the specific configurations used at CPSES. Additionally the report states that TU Electric will complete additional plant specific ampacity derating testing and will identify corrective actions if required, by the completion of the first refueling outage. TU Electric is in compliance with the requested action.

Action 3) Confirm that these qualified barriers have been installed with appropriate procedures and quality controls to ensure that they comply with the NRC's requirements.

Response 3) TU Electric confirms that qualified barriers have been installed with appropriate procedures and quality controls to ensure that they comply with the NRC's requirements. This matter is also discussed in reference 3 and reference 4. TU Electric is in compliance with the requested action.

II. REPORTING REQUIREMENTS

Requirement 1) State whether Thermo-Lag 330-1 barriers are relied upon (a) to meet 10CFR50.48, to achieve physical independence of electrical systems, (b) to meet a condition of a plant's operating license, or (c) to satisfy a licensing commitment. If applicable, state that Thermo-Lag 330-1 is not used at the facility. This generic letter applies to all 1-hour and all 3-hour Thermo-Lag 330-1 materials and barrier systems assembled by any assembly method such as by

assembling preformed panels and conduit shapes, as well as spray, trowel and brush-on applications.

Response 1) As stated in response to NRC Bulletin 92-01 and Supplement 1 to Bulletin 92-01 (reference 1 and reference 2), Thermo-Lag 330-1 barriers are relied upon to satisfy NRC requirements. Additionally, reference 3 describes in detail TU Electric's licensing commitments (refer to Section 3.0 of the Engineering Report ER-ME-067).

Requirement 2) If Thermo-Lag 330-1 barriers are used at the facility,

(a) State whether or not the licensee has qualified the Thermo-Lag 330-1 fire barriers by conducting fire endurance tests in accordance with the NRC's requirements and guidance or licensing commitments.

(b) State (1) whether or not the fire barrier configurations installed in the plant represent the materials, workmanship, methods of assembly, dimensions, and configurations of the qualification test assembly configurations; and (2) whether or not the licensee has evaluated any deviations from the tested configurations.

(c) State (1) whether or not the as-built Thermo-Lag 330-1 barrier configurations are consistent with the barrier configurations used during the ampacity derating tests relied upon by the licensee for the ampacity derating factors used for all raceways protected by Thermo-Lag 330-1 (for fire protection of safe shutdown capability or to achieve physical independence of electrical systems) and (2) whether or not the ampacity derating test results relied upon by the licensee are correct and applicable to the plant design.

Response 2a) Reference 3 and reference 4 describe in detail that; TU Electric has qualified the Thermo-Lag 330-1 fire barriers by conducting fire endurance tests in accordance with the NRC's requirements and guidance and licensing commitments.

Response 2b) The fire barrier configuration installed in the plant represent the materials, workmanship, methods of assembly, dimensions, and configurations of the qualification test assemblies and configuration. Additionally, TU Electric has evaluated the configurations which did not represent the tested configurations, these evaluations have been provided to your staff via reference 4.

Response 2c) Refer to Section I, response to Action 2, above.

Requirement 3) With respect to any answer to items 2(a), 2(b), or 2(c) above in the negative, (a) describe all corrective actions needed and include a schedule by which such actions shall be completed and (b) describe all compensatory measures taken in accordance with the technical specifications or administrative controls. When corrective actions have been completed, confirm in writing their completion.

Response 3a) Although additional plant specific ampacity testing is planned no additional corrective actions are presently required.

Response 3b) Reference 1 and reference 2, which are responses to NRC Bulletin 92-01 and Supplement 1 to Bulletin 92-01, describe the appropriate compensatory measures. At the date of this letter, the installation of the Thermo-Lag barrier system is not complete for Unit 2. If the Unit 2 low power operating license is issued prior to the completion of this Thermo-Lag installation, such compensatory measures shall be established as needed.

Requirement 4) List all Thermo-Lag 330-1 barriers for which answers to item 2 cannot be provided in the response due within 120 days from the date of this generic letter, and include a schedule by which such answers shall be provided.

Response: Not applicable for Unit 2. Responses for Unit 1 will be provided within the allotted time.

Reference 5 and 6 accepted TU Electric's response to NRCB 92-01 and its supplement and requested that TU Electric inform the NRC when corrective actions are complete. As noted above, corrective actions are complete and all that remains is the completion of Thermo-Lag installation for Unit 2.

Should you have any questions or need additional information please contact Obaid Bhatty at (817) 897-5839.

Sincerely,

William J. Cahill, Jr.

OB/tg
Attachment

c - Mr. J. L. Milhoan, Region IV
Resident Inspectors, CPSES (2)
B. E. Holian, NRR
T. A. Bergman, NRR

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the Matter of	)
	)
Texas Utilities Electric Company	) Docket Nos. 50-446
	)
(Comanche Peak Steam Electric Station, Unit 2)	)

AFFIDAVIT

William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear of TU Electric, the lead Applicant herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this response to Generic Letter 92-08 for the captioned facility; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

William J. Cahill, Jr.
Group Vice President, Nuclear

STATE OF TEXAS)
)
COUNTY OF Somervell)

Subscribed and sworn to before me, on this 19th day of January, 1993.

Darlene Scott
Notary Public