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November 2, 1998

U.S. Nuclear Regulatory Commission
Document Control Desk, OP1-37
Washington, DC 20555

Subject: River Bend Station - Unit I
Docket No. 50-458
License No. NPF-47
Comments on NRC's Safety Evaluation on Thermo-Lag
Related Ampacity Derating (TAC MA2242)

Reference: RBC-48372, D. Wiggington, NRC, to J. McGaha, Entergy Operations, Inc.,
"River Bend Station, Unit 1 - Thermo-Lag Related Ampacity Derating (TAC
MA2242), dated September 3, 1998

NRC Generic Letter 92-08, "Thermo-Lag 330-1, Fire Barriers," dated
December 17, 1992¹

File Nos.: G9.5, G9.33.4

RBG-44691
RBF1-98-0265

Ladies and Gentlemen:

The purpose of this letter is to comment on statements in the NRC's referenced letter and the accompanying Safety Evaluation. Specifically, the letter implies that the continuum of the models used for electrical cable ampacity derating to account for fire barrier enclosures is not acceptable. EOI calculations use several different models, dependent upon the fire barrier configuration installed in the field. In fact, as noted in the letter, only the thermal model was found to be unacceptable, but is unnecessary for resolution of the issue because the special configuration was modified (*i.e.*, the fire barriers were removed) and is no longer used. We

¹ NRC Generic Letter 92-08 identified three principal areas of concerns: (1) fire endurance capability of Thermo-Lag 330-1 barriers, (2) the ampacity derating of cables enclosed in Thermo-Lag 330-1 barriers, and (3) the evaluation and application of the results of tests conducted to determine the fire endurance ratings and the ampacity derating factors of Thermo-Lag 330-1 barriers.

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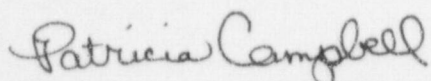
Page 2 of 2

believe that the NRC's conclusion, as stated, fails to recognize that the remaining models were found acceptable.

Because the conclusion, as stated, could be misleading, we request that the Safety Evaluation and the transmittal letter be revised to indicate that, while one model was unacceptable, the remaining models were found acceptable. The NRC's conclusion "that there are no ampacity derating issues as identified in Generic Letter 92-08 for River Bend Station" is more properly supported by noting that the models for all current configurations are acceptable.

No commitments are included in this submittal. If you have any questions, please contact Patricia Campbell at (225) 381-4615.

Sincerely,



for
RJK/PLC

cc:

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