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SUBJECT: Responds to GL 92-08, "Thermo-Lag 330-1 Fire Barriers" for  
 RE Ginna Nuclear Power Plant.

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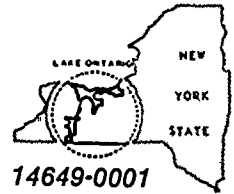
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April 16, 1993

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U.S. Nuclear Regulatory Commission  
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Attn: Allen R. Johnson  
Project Directorate I-3  
Washington, D.C. 20555

Subject: Response to Generic Letter 92-08, Thermo-Lag 330-1 Fire Barriers  
R. E. Ginna Nuclear Power Plant  
Docket No. 50-244

Reference: (a) Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: Response to Bulletin 92-01 Supplement 1, dated September 30, 1992.

Dear Mr. Johnson:

On December 17, 1992, the Nuclear Regulatory Commission (NRC) issued Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers" which documented concerns that have been raised with respect to the capability of the fire barriers manufactured by Thermal Science, Incorporated (TSI). The requested actions and our 120 day response are identified below:

1. State whether Thermo-Lag 330-1 barriers are relied upon (a) to meet 10 CFR 50.48, 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.

Response: RG&E has not used Thermo-Lag 330-1 fire barrier material in any application at Ginna Station. This information was also provided to the NRC by Reference (a).

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.

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- (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; and (2) whether or not the ampacity derating test results relied upon by the licensee are correct and applicable to the plant design.

Response: This question is not applicable since Thermo-Lag fire barriers have not been utilized at Ginna Station.

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 complete, confirm in writing their completion.

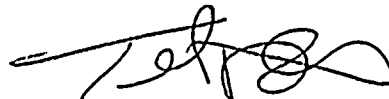
Response: This question is not applicable since Thermo-Lag fire barriers have not been utilized at Ginna Station.

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: This question is not applicable since Thermo-Lag fire barriers have not been utilized at Ginna Station.

Although the generic letter does not request actions for fire barrier materials other than the Thermo-Lag 330-1 fire barrier system, RG&E has initiated activities in order to avoid similar problems that have been identified by the generic letter. These activities have included field walkdowns and a current ongoing review of fire endurance and ampacity derating tests to determine whether or not the identified concerns are applicable to Ginna Station configurations.

Very truly yours,



Thomas S. Richards  
General Counsel

MDF/517

Subscribed and sworn to before me  
on this 16th day of April, 1993.



MARIE C. VILLENEUVE  
Notary Public, State of New York  
Monroe County  
Commission Expires October 31, 1994

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xc: Mr. Allen R. Johnson (Mail Stop 14D1)  
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Washington, D.C. 20555

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Ginna Senior Resident Inspector