ILLINOIS POWER COMPANY

500 SOUTH 27TH STREET, DECATUR, ILLINOIS, 62525

0981-L
U-0264
Q37-81(07-17)-L

July 17, 1981

Mr. C.E. Norelius
Acting Director
Division of Engineering and Technical Inspection
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 61037

Dear Mr. Norelius:

This is a supplemental response to our July 5, 1981 letter which responded to your Notice of Violation and Inspection Report number 50-461/81-09. The additional concerns expressed in your followup letter of June 19, 1981 have also been considered in developing this response.

1. Flexible Conduit Used For Electrical Separation

The GE PGCC design does not depend upon flexible conduit to provide a fire barrier between the wiring inside the conduit and the wiring outside the conduit. In the CPS design, there is no need for a fire barrier because internal fires are effectively prevented by the circuit fusing. This is considered acceptable because all conduits are grounded to ensure that hot shorts in internal wiring will melt upstream fuses, providing short circuit protection that limits the fault to the non-divisional cables. Consequently, this design application is consistent with NEDO 10466A.

2. Flexible Conduit Used as Part of a Fire Barrier

Based on results from fire tests, we conclude that flexible conduit passing through a fire barrier between two divisional ducts does not compromise the integrity of that fire barrier. Fire seals are provided wherever conduit penetrates a divisional boundary (external to the conduit). Fire tests have shown that a fire in a wiring duct containing flexible conduit did not propagate through the fire barrier containing the conduit.

Based on the foregoing, Illinois Power considers the use of flexible conduit in the PGCC design for fire protection, intercom, and utility services wiring to be acceptable.

Illinois Power does, however, agree that an interpretational discrepancy does exist between the Clinton PGCC design and the PGCC Topical Report NEDO-10466A. To address this discrepancy, we will modify the FSAR, Section 8.3, to describe and justify the Clinton PGCC design and to reconcile it with the wording in Topical Report (NEDO-10466A).

We expect to amend the FSAR by the end of 1981.

In summary, we have reviewed the issue of separation associated with the flexible conduit as used in PGCC and find the installation to be consistent with good design practices and the results of PGCC fire tests. When the FSAR has been revised, it will document full compliance with regulatory requirements. I trust that our response is satisfactory to allow closeout of this issue when all actions are complete. I hereby affirm that the information contained in this letter is correct to the best of my knowledge.

Sincerely,

L. J. Koch
Vice President

cc: H. H. Livermore, NRC Resident Inspector
Director-Quality Assurance