



Northern States Power Company

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April 16, 1993

US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

10 CFR Part 50
Section 50.54(f)


PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

Response to Generic Letter 92-08, "Thermo-Lag 330-1
Fire Barriers". (TAC Nos. M83917 and M83918)

Attachment 2 to this letter provides our response to Generic Letter 92-08,
"Thermo-Lag 330-1 Fire Barriers."

This letter contains no new NRC commitments, nor does it modify any prior
commitments.

Please contact Jack Leveille (612-388-1121, Ext. 4662) if you require further
information.


For Roger O. Anderson
Director

Licensing and Management Issues

cc: Regional Administrator - III, NRC
NRR Project Manager, NRC
Sr Resident Inspector, NRC
State of Minnesota
Attn: Kris Sanda
J Silberg

Attachments: 1) Affidavit to the US Nuclear Regulatory Commission
2) Response to Generic Letter 92-08

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ATTACHMENT 1

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

DOCKET NOS. 50-282
50-306

THERMO-LAG 330-1 FIRE BARRIERS

Northern States Power Company, a Minnesota corporation, with this letter is submitting information requested by Generic Letter 92-08, Thermo-Lag 330-1 Fire Barriers, pursuant to 10 CFR 50.54(f).

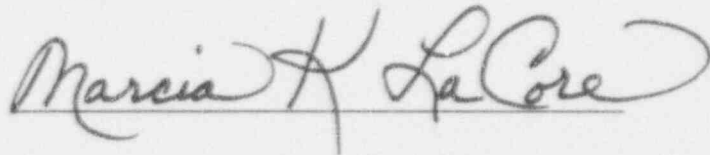
This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By 

Leon R Eliason
President
NSP Generation

On this 16th day of April 1993 before me a notary public in and for said County, personally appeared Leon R Eliason, President, NSP Generation, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Northern States Power Company, that he knows the contents thereof, and that to the best of his knowledge, information, and belief the statements made in it are true and that it is not interposed for delay.





ATTACHMENT 2

Response to Generic Letter 92-08

The following information is provided in response to the reporting requirements contained in Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers."

- References:
1. Letter dated July 24, 1992 from T M Parker, Northern States Power Company, to US Nuclear Regulatory Commission titled "Response to NRC Bulletin 92-01 Failure of Thermo-Lag 330 Fire Barrier System to Maintain Cabling in Wide Cable Trays and Small Conduits from Fire Damage"
 2. Letter dated October 5, 1992 from M Gamberoni, US Nuclear Regulatory Commission, to T M Parker, Northern States Power Company, titled "Response to NRC Bulletin 92-01, 'Failure of Thermo-Lag 330 Fire Barrier System' - Prairie Island Nuclear Generating Plant, Units 1 and 2 - (TAC Nos. M83917 and M83918)"

Reporting Requirement No. 1 states:

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. 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

The facility presently uses Thermo-Lag 330-1 fire barriers to meet the 10 CFR Part 50, Section 50.48 requirements for physical independence of electrical systems. The fire barriers are used to provide train separation between the installed Train A and Train B components. Electrical wiring associated with Train B components is protected by Thermo-Lag 330-1 fire barriers where the separation criteria of Appendix R is not met.

Reporting Requirement No. 2 states:

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

- (a) The facility used the fire endurance tests as provided by Thermo Science Incorporated (TSI). No test were conducted by the facility on the TSI approved installation configurations that were installed.
- (b) The facility installation methods and materials were approved by TSI and installed by employees trained and certified by TSI as installers. The only deviations to the approved installation procedures were some minor construction aides that were approved by TSI during their evaluation of installation methods and materials.
- (c) (1) The as-built Thermo-Lag 330-1 fire barriers were installed in the same configuration as that used in the ampacity derating tests provided by an independent consultant (Stone and Webster Engineering Company): "Fire Protection per Appendix R Requirements Ampacity Study".
- (2) This study provided cable derating values consistent with the as-built configuration of the facility.

Reporting Requirement No. 3 states:

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

- (a) At the present time we are awaiting the results of the efforts in place by the Nuclear Management and Resource Council (NUMARC). NUMARC is developing a test matrix and fire test schedule to possibly conduct additional testing once the NRC has completed the finalization of the test acceptance criteria. In addition it is anticipated that NUMARC will be contracting with an independent testing facility to resolve the combustibility issue of Thermo-Lag 330-1.
- (b) Until the NUMARC tests are completed, we will continue with the compensatory measures described in our response to Bulletin 92-01 (Reference 1) which were found acceptable (Reference 2).

Reporting Requirement No. 4 states:

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

All installed Thermo-Lag 330-1 barriers are addressed in our response to item 2.