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8G.120
JGC-396-94
December 16, 1994
10CFR50.54(f)

Docket No. 50-461

Document Control Desk
Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Illinois Power's Response to the Nuclear Regulatory
Commission's Follow-Up to the Request
for Additional Information Regarding Generic Letter
92-08, "Thermo-Lag 330-1 Fire Barriers"

Dear Sir:

This provides Illinois Power's (IP) response to the Nuclear Regulatory Commission's (NRC) letter of September 19, 1994, concerning Generic Letter (GL) 92-08 and the request for additional information dated December 21, 1993. The NRC requested that IP submit the information which was deferred in the original response (IP letter U-602250, dated February 9, 1994) to the request for additional information. Specifically, the NRC requested that IP provide follow-up information to section II, "Important Barrier Parameters," section III, "Thermo-Lag Fire Barriers Outside the Scope of the NUMARC Program," and section IV, "Ampacity Derating," of the request for additional information.

In IP's response to section II of the request for additional information, IP stated that the unknown parameters would not be evaluated in cases where the need for Thermo-Lag fire barriers is eliminated through plant modifications or the existing Thermo-Lag fire barrier is determined to be acceptable as-is. IP's evaluation of the 11 Thermo-Lag installations at CPS has concluded that hardware modifications that do not rely on Thermo-Lag are necessary to resolve four of the installations and that the remaining seven installations are acceptable as-is. In evaluating the existing CPS Thermo-Lag installations, IP made conservative assumptions with regard to plant specific information that was not available. Consequently, consistent with IP's position stated in the February 9, 1994 letter, IP does not need to obtain or evaluate the unknown Thermo-Lag parameters.

Concerning section III, "Thermo-Lag Fire Barriers Outside the Scope of the NUMARC Program," IP has reviewed the Nuclear Energy Institute (NEI) test data and the NEI Application Guide. Fire endurance evaluations, which considered all NEI, Texas Utilities Electric (TUE), Sandia National Laboratories, and Tennessee Valley Authority

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test data available, as well as the NEI Application Guide, have been performed on five of the seven installations that will be used as-is. The parameters of importance, which were identified in letter U-602250, were also considered as part of the fire endurance evaluations. Based on these considerations, IP has determined that these installations of Thermo-Lag are bounded by the test samples. This means that the CPS installations are enveloped by one or more of the tested configurations, but not necessarily identical. The fire endurance evaluations include justification which explains why CPS's installations are bounded by the tested installations. The table below identifies the industry tests that envelope each of the CPS installations:

<u>CPS Installation*</u>	<u>Bounding Tests</u>
A-1a	combination of NEI Test 2-1, NEI Test 2-7, and NEI Test 2-8
CB-1e	combination of NEI Test 2-1, NEI Test 2-2, NEI Test 2-7, and NEI Test 2-8
CB-1f North	NEI Test 2-10
CB-1f South	NEI Test 2-10
D-8	NEI Test 2-1, TUE Scheme 9-1

*Location provided in IP letter U-602250.

The fire endurance capability of the remaining two installations, which do not protect safe shutdown equipment, was not pertinent to the safety evaluations; therefore, no fire endurance evaluations were completed for these installations.

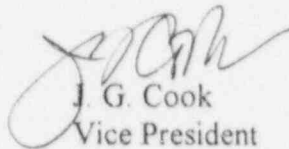
Regarding section IV, "Ampacity Derating," IP committed to incorporate the applicable values, expected to be provided by NEI, into our electrical design calculations when they become available. As of this date, NEI has not issued their ampacity derating factors. The NRC did, however, issue Information Notice 94-22, "Fire Endurance and Ampacity Derating Test Results for 3-Hour Fire-Rated Thermo-Lag 330-1 Fire Barriers." Evaluations comparing the ampacity derating factors described in the information notice with those that apply at CPS indicate that the CPS derating factors are more conservative. Therefore, at this time, there is no need to revise the electrical design calculations.

In the September 19, 1994 letter, it was stated that the NRC would not accept a resolution of Thermo-Lag issues based solely on a performance based approach such as Probable Risk Assessment (PRA). PRA is but one of many considerations being applied to determine if the installations of Thermo-Lag at CPS are acceptable as-is. Others include, but are not limited to, fire modeling, fire protection design features, the

administrative controls in place and the physical layout of the specified areas, the endurance of the Thermo-Lag 330-1 Fire Barrier as determined by industry testing, and the operator response to fires affecting safe shutdown equipment using the Emergency Operating Procedures. These considerations have justified deviations from the requirements of 10 CFR 50, Appendix R, for seven of the 11 installations of Thermo-Lag at CPS. For these installations, IP has prepared safety evaluations in accordance with 10CFR50.59 to demonstrate that the existing measures in place at CPS ensure that the safe shutdown capability is maintained.

Attachment 1 provides an affidavit supporting the facts set forth in this letter.

Sincerely yours,



J. G. Cook
Vice President

WTD/csm

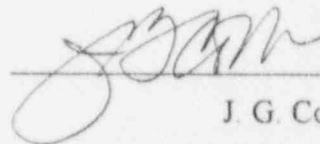
Attachment

cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety

J. G. Cook, being first duly sworn, deposes and says: That he is Vice President of the Nuclear Program at Illinois Power; that this letter, which supplies additional information regarding Generic Letter 92-08, was prepared under his supervision and direction; that he knows the contents thereof; and that to the best of his knowledge and belief said letter and the facts contained therein are true and correct.

Date: This 16 day of December 1994.

Signed: _____

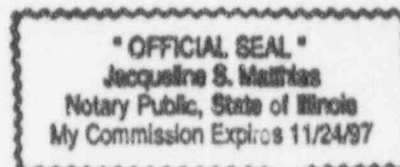


J. G. Cook

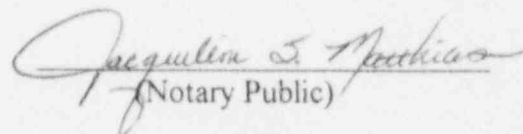
STATE OF ILLINOIS

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Dewitt COUNTY



Subscribed and sworn to before me this 16th day of December 1994.


(Notary Public)