

**Commonwealth Edison**

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 Address Reply to: Post Office Box 767
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February 10, 1984

Mr. James G. Keppler
 Regional Administrator
 U.S. Nuclear Regulatory Commission
 Region III
 799 Roosevelt Road
 Glen Ellyn, IL 60137

PRINCIPAL STAFF			
RA	<i>Handwritten initials</i>	DPRP	
D/RA		DE	
A/RA		DRMSP	
RC		DRMA	
PAO		SCS	
SGA		ML	
ENF		File	<i>Handwritten initials</i>

Subject: LaSalle County Station Unit 2
 Acceptance Criteria for Firecode
 CT Gypsum Fire Stops
 NRC Docket No. 50-374

- References (a): June 24, 1983 letter from D. L. Farrar to J. G. Keppler regarding Firecode CT Gypsum Cement Fire Stops.
- (b): August 5, 1983 letter from C. W. Schroeder to J. G. Keppler, same subject.
- (c): November 23, 1983 letter from C. W. Schroeder to H. R. Denton regarding Fire Protection Commitments.

Dear Mr. Keppler:

In Issue 11, Item 3 of Reference (c), CECO committed to review the acceptance for Firecode CT Gypsum Cement Fire Stops and either provide additional justification for the 3/8" separation criteria or submit a new acceptance criteria to the NRC for approval. We have decided to change the acceptance criteria because we have no further justification for the 3/8" criteria than that furnished in References (a) and (b). Also, we do not believe that additional testing will resolve this issue regarding the 3/8" criteria due to the variety and number of cracks and separations that could occur; it would be almost impossible to duplicate actual field conditions on the test stand. Another problem with testing cracked fire stops is that none of the fire standards such as NFPA, ASTM and NML address fire seals with irregular surfaces.

Therefore, we propose to revise the acceptance criteria for cracks and separations in gypsum cement fire stops from 3/8" wide to less than or equal to 1/32" wide by 1" deep. In other words, only hairline cracks will be accepted, by any crack or separation in the seal greater than 1/32" wide by 1" deep will be repaired. During the meeting with NRR

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J. G. Keppler

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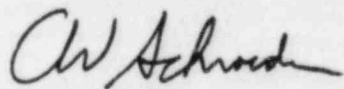
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on November 16, 1983, it was indicated that a 1/32" separation criteria would be acceptable based on the fire test reports that we submitted to them. One of these reports, Transco Fire Test Report No. TR-109 dated April 7, 1983, noted the presence of a hairline crack in the fire seal before it was tested, and the test demonstrated that the crack did not degrade the fire stop. We expect to complete the revision to the surveillance procedures to incorporate the new criteria by March 1, 1984.

To the best of my knowledge and belief the statements contained herein are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison and contractor employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

If there are any further questions regarding this matter, please contact this office.

Very truly yours,

 2/10/84

C. W. Schroeder
Nuclear Licensing Administrator

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cc: NRC Resident Inspector - LSOS

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