

Duquesne Light Company

Beaver Valley Power Station
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GEORGE S. THOMAS
Division Vice President
Nuclear Services
Nuclear Power Division

March 23, 1995

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

**Subject: Beaver Valley Power Station, Unit No. 2
Docket No. 50-412, License No. NPF-73
Response to Follow-up to the Request for
Additional Information Regarding Generic
Letter 92-08, "Thermo-Lag 330-1 Fire Barriers"**

- References:
1. NRC Letter to DLC dated December 23, 1994, Follow-up to the Request for Additional Information Regarding Generic Letter 92-08 Issued Pursuant to 10 CFR 50.54(f).
 2. DLC Letter to NRC dated December 22, 1994, Response to 10 CFR 50.54(f) Follow-up to the Request for Additional Information Regarding Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers."
 3. DLC Letter to NRC dated February 11, 1994, Response to Request for Additional Information to NRC Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers."
 4. NEI Letter to NRC dated January 17, 1995.
 5. NEI Letter to NRC dated February 21, 1995.

In response to the Nuclear Regulatory Commission's (NRC's) follow-up to the request for additional information (Reference 1) regarding Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers," for the Beaver Valley Power Station (BVPS) Unit 2, the following information is provided.

The recently issued 50.54(f) letter requesting independent confirmation of existing Thermo-Lag 330-1 fire barrier material has raised industry concerns which were communicated by the Nuclear Energy Institute (NEI) to the NRC (Reference 4) because the information requested far exceeds what is necessary to provide reasonable assurance of fire barrier performance. Duquesne Light Company is participating in an industry effort to evaluate chemical composition as a means of addressing product consistency and thereby meet the intent of the requested information noted in Reference 1. NEI will provide information on product consistency, based on the chemical composition testing, to the NRC and industry. This industry approach was communicated to the NRC via letter from NEI (Reference 5). Thermo-Lag fire barrier material samples taken from BVPS Unit 2 in-plant installations and also from warehouse stock material have been sent out for analysis as part of this industry effort.

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Independent of information and data supplied by TSI, the following actions have been conducted as part of our efforts to evaluate the performance capability of the existing Unit 2 Thermo-Lag assemblies:

- Reviewed existing engineering and design documentation.
- Reviewed QA/QC verification procedures and installation documentation.
- Conducted interviews with original installers who are still employed at the plant to confirm installation procedures and construction techniques.
- Performed extensive plant walkdowns and visual inspections of as-installed configurations.
- Conducted destructive examinations on a sample basis of in-plant Thermo-Lag assemblies.

The destructive examinations of specific Thermo-Lag fire barriers confirmed installation details and construction techniques that could not be obtained by visual inspections. Important barrier parameters identified previously by the NRC have been reviewed and the results provided in Reference 2 and Reference 3.

The NEI Application Guide for Thermo-Lag has been utilized to evaluate Thermo-Lag raceway assemblies required for safe shutdown of BVPS Unit 2. Destructive examinations of Thermo-Lag barriers have been completed on a sample basis to confirm construction techniques and barrier parameters meet installation specifications. Based on our efforts to date, we have concluded that Thermo-Lag fire barrier parameters have been adequately assessed, and the majority of the BVPS Unit 2 Thermo-Lag configurations are bounded by the NEI Application Guide. These Thermo-Lag assemblies, when compared to the industry testing program results, were determined to be capable of providing specific fire ratings as installed. Detailed information on the visual inspections and the destructive examinations will be retained onsite for NRC audit.

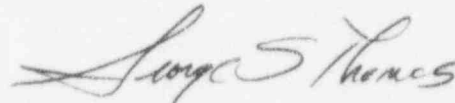
As noted in our previous response (Reference 2), re-evaluation efforts of our safe shutdown methodology for a fire event at BVPS Unit 2 has resulted in approximately 50% of the circuits and their associated protective fire barriers being excluded from consideration. This effort has resulted in a decrease in the number of fire areas requiring compensatory measures in the form of hourly fire watch patrols. Until the Thermo-Lag fire barrier issues are resolved, or it can be demonstrated that the barriers are unnecessary, we will maintain the fire watch patrols for the remaining areas.

Additional generic testing of various Thermo-Lag configurations, including boxed enclosures, will be conducted by NEI in the near future. The results of the testing will be factored into our overall program for demonstrating adequacy of fire barriers. Reference 2 identified a date of June 30, 1995, for completion of engineering evaluations to address

fire endurance issues. In consideration of the additional generic testing, we project that engineering evaluations will be delayed until November 30, 1995. However, resolution of the Thermo-Lag issue is still scheduled for the sixth refueling outage (2R6) for BVPS Unit 2, which is scheduled to start in late 1996.

Should you have any questions concerning this response, please contact Mr. Nelson R. Tonet, Manager, Nuclear Safety, at (412) 393-5210.

Sincerely,

A handwritten signature in cursive script, reading "George S. Thomas".

George S. Thomas

Attachment

c: Mr. L. W. Rossbach, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. D. S. Brinkman, Project Manager

AFFIDAVIT

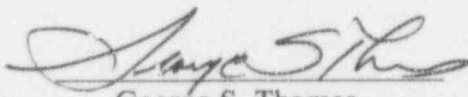
COMMONWEALTH OF PENNSYLVANIA)

) SS:

COUNTY OF BEAVER)

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for Additional Information Regarding Generic Letter 92-08,
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Before me, the undersigned notary public, in and for the County and Commonwealth aforesaid, this day personally appeared George S. Thomas, to me known, who being duly sworn according to law, deposes and says that he is Division Vice President, Nuclear Services of the Nuclear Power Division, Duquesne Light Company, he is duly authorized to execute and file the foregoing submittal on behalf of said Company, and the statements set forth in the submittal are true and correct to the best of his knowledge, information and belief.


George S. Thomas

Subscribed and sworn to before me

on this 23rd day of March, 1995

