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Ref. # GL 92-08

November 22, 1995

C. Lance Terry
Group Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Room
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 1
DOCKET NO. 50-445
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
FOLLOW UP TO GENERIC LETTER 92-08 (TAC NOS. M85536 AND 85537)

- REF: 1) NRC Letter dated May 17, 1995, from Mr. Timothy J. Polich to Mr. C. Lance Terry
- 2) TU Electric Letter logged TXX-95136 dated August 8, 1995, from Mr. C. Lance Terry to NRC

Gentlemen:

Reference 1 requested that Texas Utilities Electric Company (TU Electric) provide additional information regarding Thermo-Lag fire barrier material received and installed at CPSES. In Reference 2, TU Electric responded to that request.

Via Reference 2, TU Electric stated that, it does not believe that there is a technical or regulatory bases for requiring any further chemical sampling to support the acceptability of the Thermo-Lag installed at CPSES Units 1 and 2 as qualified fire barriers. Nonetheless, TU Electric, in response to suggestions from the NRC and to support the industry in its response to this aspect of the qualification of Thermo-Lag, decided to participate in the NEI test program to assess the chemical formulation of Thermo-Lag. In this respect TU Electric provided 10 samples to the Nuclear Energy Institute (NEI) endorsed program to perform the chemical analysis.

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The NEI program consisted of Pyrolysis Gas Chromatography (PGC) with Mass Selective Detection (MSD) of 169 samples from the participating utilities to assess organic composition, and Energy Dispersive X-Ray Spectroscopy of 33 samples to assess inorganic chemical composition. On the basis of these tests, the test lab, NUCON International, Inc., concluded that all samples contained the constituents identified by Thermal Science Inc., as essential to fire barrier performance. NUCON also determined that the composition of the sample population was consistent. A copy of the summary report has been provided to the NRC by NEI. The TU Electric samples were consistent with the other utility samples. A copy of the summary pages from the NUCON report for TU Electric samples are contained in Attachment 1 to this letter.

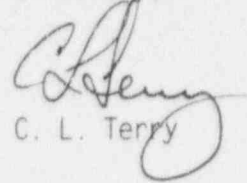
The NUCON test results indicate that 8 of the 10 Thermo-Lag samples are consistent in terms of chemical composition to other Thermo-Lag samples tested as part of the NEI generic testing program. The remaining 2 samples labeled as "Flexi-Blanket" were not consistent with the other Thermo-Lag [supplied by other Utilities] samples. Per discussions with NUCON and review of the NUCON test report issued for TU Electric, it was concluded that; "Flexi-Blanket" (product name 330-660) is similar in composition and in the same product family. However, proportions of the ingredients used in the "Flexi-Blanket" are different than the Thermo-Lag base material (product name 330-1). The chemical composition of these two samples of "Flexi-Blanket" material are consistent with the expected values for the product name 330-660 material. The NEI generic testing program did not involve "Flexi-Blanket" samples from other utilities and this accounts for the sample inconsistencies identified by the independent laboratory(NUCON).

As stated in Reference 2, TU Electric performed its own tests, under the auspices of its Quality Control program using Infrared Spectroscopy method. Ten samples of Thermo Lag material were analyzed using Fourier Transform Infrared spectroscopy (FTIR). These samples were obtained from various locations of the plant. Based on FTIR testing, the samples are the same basic product formulation.

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If you have any questions regarding the information in the attachment, please contact Obaid Bhatti at (817) 897-5839.

Sincerely,



C. L. Terry

OB/ob
Attachment

c - Mr. L. J. Callan, Region IV
Mr. W. D. Johnson, Region IV
Mr. K. S. West, NRR
Mr. T. J. Polich, NRR
Mr. W. H. Rasin, NEI
Resident Inspectors

ATTACHMENT 1 TO TXX-95291

Summary Pages from NUCON International, Inc. Test Report
of Comanche Peak Steam Electric Station's Thermo-Lag Chemical Samples