



Nuclear Management Company, LLC  
Point Beach Nuclear Plant  
6610 Nuclear Road  
Two Rivers, WI 54241

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NRC 2001-008

March 9, 2001

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, DC 20555

Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301  
FIRE BARRIER TO BE DEGRADED  
FOR MORE THAN SEVEN DAYS  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Enclosed is a special report for Point Beach Nuclear Plant (PBNP), Unit 1 and Unit 2. This report is provided in accordance with the PBNP Fire Protection Evaluation Report (FPER), Section 7.2.2.5. That section requires the submittal of a special report to the U. S. Nuclear Regulatory Commission when degradation of fire protection systems or components exceeds the time listed in FPER Section 7.2.2. Paragraph C.1.b(4) of that section requires this special report if an inoperable fire barrier will not be restored to an operable status within a seven day period. As discussed in the enclosure to this letter, we are planning to degrade a fire barrier wall between the PBNP control room and the cable spreading room for a period exceeding seven days while completing a modification to DC electrical distribution panels attached to that wall.

If you have any questions concerning our plans in this regard, please contact us.

Sincerely,



A. J. Cayia  
Plant Manager

Enclosure

CWK/

cc: NRC Resident Inspector  
NRC Regional Administrator

A006

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### **Degradation of Fire Barrier Wall M-3-3-37**

This report is submitted in accordance with the PBNP Fire Protection Evaluation Report (FPER) Section 7.2.2.5, "Reportability," which requires a special report when specified fire protection features or equipment, including fire barriers and fire barrier components, are degraded or inoperable in excess of program requirements. As required by the FPER, this report includes a description of action(s) taken, or to be taken, the cause of the inoperability or degradation, and the plans and schedule for restoring the system to operable status.

#### Description

The approved fire protection program described in the PBNP FPER, Section 7.2.2.1, "Applicability," specifies that fire protection components which provide fire protection capability for equipment required for safe plant shutdown shall be operable whenever the equipment protected by the fire protection is required to be operable. Fire barriers (Section 7.2.2.3.C) are included in the fire protection features identified in the FPER. PBNP Operations Manual procedure OM 3.27, "Control of Fire Protection and Appendix R Safe Shutdown Equipment," clarifies the requirement for fire barriers at Section 5.1.3. That procedure states that all fire barriers and fire barrier components (i.e. walls, floors and ceiling barriers, penetration seals, fire doors, fire dampers and electrical raceway fire barriers) protecting safe shutdown areas shall be operable.

During the Spring 2001 PBNP Unit 1 refueling outage, we will be installing a modification to the 125VDC distribution system which will include replacement of two DC distribution panels. These panels are located on the control room (CR) side of wall M-3-3-37 at elevation 46. This wall is a three hour rated fire barrier between the CR and the stairway access to the cable spreading room (CSR), located on elevation 26. Both the CR and the CSR are safe shutdown areas. This wall is constructed of hollow concrete block, approximately eight inches thick. Both sides of this wall are covered with gypsum plaster, approximately ½ inch on the CR side and ¾ inch on the CSR side. The plaster is necessary for the three hour fire rating of the wall.

In preparation for mounting the replacement DC distribution panels, it will be necessary to remove the plaster from a portion of this wall over an area of approximately four feet by three feet. This is necessary in order to determine the exact location of the mortar joints in the block wall and to identify precisely where the wall anchors for the new DC distribution panels will be located. Removing this plaster will result in a degradation of this fire barrier wall to less than a three hour fire rating.

#### Actions to be Taken

In accordance with FPER 7.2.2.3.C.1.b and OM 3.27, Section 5.1.3, the following compensatory measures will be initiated at the time the plaster is removed and maintained in effect until the panel relocation is complete and the wall restored to the three hour rated configuration:

- The immediate area on each side of the fire barrier will be inspected just prior to initiating the plaster removal to assure that potential fire hazards are minimized.

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- Activity in the immediate area on each side of this fire barrier will be restricted to that which is necessary for continued operation, including installation of the modification, and to enable restoration of the barrier degradation.
- An hourly fire watch inspection shall be performed on each side of the fire barrier in accordance with Section 8.0 of OM 3.27. The control room is continuously manned and the CSR will be checked hourly.

Since we anticipate that this barrier degradation will be necessary for greater than seven days, we are submitting this special report addressing this issue in advance of initiating this work.

### Plans and Schedule

This DC panel replacement will be the final installation package for the DC system upgrade project. This project enhances the DC distribution system by resolving DC circuit coordination issues, eliminating the DC molded case circuit breaker (MCCB) reliability issues, and improving the DC panel loading logic. The PBNP Unit 1 refueling outage is presently scheduled to begin on April 6, 2001. The DC system modification will be performed through out the outage and requires complex coordination with plant conditions. Due to the affected common loads, entry into Limiting Conditions for Operation (LCOs) are not avoidable and add to the complexity of the modification scheduling. Non-intrusive work is already in progress to ensure that the LCOs associated with the work are minimized.

In order to properly prepare for this modification and to minimize the time duration for the actual replacement of the distribution panels, we have determined that it would be expedient to remove the gypsum plaster from the effected portion of this wall on or about March 26, 2001. As discussed, at that time the compensatory measures outlined above would be initiated.

The schedule and installation work plan for the 125VDC distribution modification indicates that we will be finished with the panel relocation and able to restore the wall to its three hour fire rated configuration by May 4<sup>th</sup>, 2001. These dates allow for some flexibility in coordinating this modification work with other activities scheduled during this outage. Should conditions require us to revise our proposed schedule for this activity, such that the date for restoration of this fire barrier is extended, we will notify the NRC by means of a supplement to this special report.