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HABERMEYER,H.W. Carolina Power & Light Co.
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SUBJECT: Responds to GL 92-08, "Thermo-Lag 330-1 Fire Barriers." Util has not performed specific testing of matl & has relied upon vendor testing & installation program to satisfy commitments.Design margin conservative.

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CP&L
Carolina Power & Light Company
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APR 16 1993

H. W. HABERMEYER, JR.
Vice President
Nuclear Services Department

SERIAL: NLS-93-101

United States Nuclear Regulatory Commission
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62

RESPONSE TO NRC GENERIC LETTER 92-08, "THERMO-LAG 330-1 FIRE BARRIERS"

Gentlemen:

The purpose of this letter is to provide Carolina Power & Light Company's (CP&L) response to NRC Generic Letter 92-08 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2), the Shearon Harris Nuclear Power Plant (SHNPP), and the Brunswick Steam Electric Plant, Unit Nos. 1 and 2 (BSEP).

On December 17, 1992, the NRC issued Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers." The Generic Letter requested that all holders of operating licenses for nuclear power reactors take the following actions:

1. State whether Thermo-Lag 330-1 barriers are relied upon (a) to meet 10 CFR 50.48, to achieve physical independence of electrical systems; (b) to meet a condition of a plant's operating license; or (c) to satisfy a licensing commitment. If applicable, state that Thermo-Lag 330-1 is not used at the facility. This Generic Letter applies to all one-hour and all three-hour Thermo-Lag 330-1 materials and barrier systems assembled by any assembly method, such as by assembling preformed panels and conduit shapes, as well as spray, trowel, and brush-on applications.

2. If Thermo-Lag 330-1 barriers are used at the facility,

   (a) State whether or not the licensee has qualified the Thermo-Lag 330-1 fire barriers by conducting fire endurance tests in accordance with the NRC's requirements and guidance or licensing commitments.

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(b) State (1) whether or not the fire barrier configurations installed in the plant represent the materials, workmanship, methods of assembly, dimensions, and configurations of the qualification test assembly configurations; and (2) whether or not the licensee has evaluated any deviations from the tested configurations.

(c) State (1) whether or not the as-built Thermo-Lag 330-1 barrier configurations are consistent with the barrier configurations used during the ampacity derating tests relied upon by the licensee for the ampacity derating factors used for all raceways protected by Thermo-Lag 330-1 (for fire protection of safe shutdown capability or to achieve physical independence of electrical systems) and (2) whether or not the ampacity derating test results relied upon by the licensee are correct and applicable to the plant design.

3. With respect to any answer to items 2(a), 2(b), or 2(c) above in the negative, (a) describe all corrective actions needed; and include a schedule by which such actions shall be completed and (b) describe all compensatory measures taken in accordance with the Technical Specifications or administrative controls. When corrective actions have been completed, confirm in writing their completion.

4. List all Thermo-Lag 330-1 barriers for which answers to item 2 cannot be provided in the response due within 120 days from the date of this Generic Letter, and include a schedule by which such answers shall be provided.

CP&L Response

Carolina Power & Light Company has utilized Thermo-Lag 330-1 material at BSEP and SHNPP, as identified in our response NLS-92-256, dated September 29, 1992, to Bulletin 92-01, Supplement 1. That response also identified that this material has not been utilized at HBR2.

Carolina Power & Light Company has utilized Thermo-Lag 330-1 at BSEP and SHNPP to satisfy 10 CFR 50.48 separation requirements, licensing commitments, and conditions associated with the Fire Protection Program.

Carolina Power & Light Company has not performed any specific testing of this material and had relied upon the vendor's testing and installation program to satisfy our commitments. However, as stated in the response to Bulletin 92-01, Supplement 1, CP&L had conservatively judged that any Thermo-Lag 330-1 applications, whether preformed shapes, sprayed, brushed-on, or trowel grade material, were suspect based on the original NRC notification. Carolina Power & Light Company has performed an additional review of the cable ampacity using the derating percentages identified in Generic Letter 92-08. Based on that review, design margin is still available using the higher percentages identified in Generic Letter 92-08.

Carolina Power & Light Company will continue to review the guidance and testing being provided through an industry program (coordinated by NUMARC) to determine the appropriate actions required to resolve this issue. Carolina Power & Light Company will continue to maintain the compensatory measures identified in NLS-92-256 until these configurations can be determined to be reliable in accordance with plant procedures and Technical Specifications. Carolina Power & Light Company will notify the NRC prior to returning these configurations to service.

Should you have any questions, please contact Mr. David C. McCarthy at (919) 546-6901.

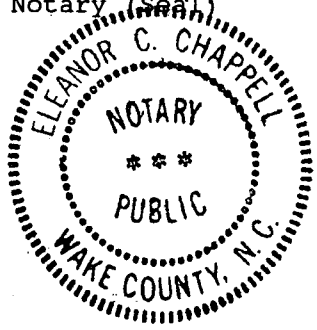
Yours very truly,

H. W. Habermeyer, Jr.

DBB/jbw

cc: Mr. S. D. Ebneter
Mr. L. W. Garner
Mr. N. B. Le
Mr. P. D. Milano
Ms. B. L. Mozafari
Mr. R. L. Prevatte
Mr. J. E. Tedrow

H. W. Habermeyer, Jr., having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

Eleanor C. Chappell
Notary (Seal)

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