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SUBJECT: Responds to NRC Bulletin 92-001, "Failure of Thermo-Lag 330 Fire Barrier Sys to Maintain Cabling in Wide Cable Trays & Small Conduits Free from Fire Damage." Precautionary fire watches established & 1 h rept submitted to NRC.

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Robert G. Byram
Vice President-Nuclear Operations
215/774-7502

JUL 24 1992

U.S. Nuclear Regulatory Commission
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SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO NRC BULLETIN 92-01 **Docket Nos. 50-387/NPF-14**
PLA-3818 **FILE R41-1A** **and 50-388/NPF-22**

This letter responds to NRC Bulletin No. 92-01, "Failure of Thermo-Lag 330 Fire Barrier System to Maintain Cabling in Wide Cable Trays and Small Conduits Free From Fire Damage" for Susquehanna Steam Electric Station. The following actions have been taken:

NRC Requested Action #1

For those plants that use either 1- or 3- hour pre-formed Thermo-Lag 330 panels and conduit shapes, identify the areas of the plant which have Thermo-Lag 330 fire barrier material installed and determine the plant areas which use this material for protecting either small diameter conduit or wide trays (widths greater than 14 inches) that provide safe shutdown capability.

PP&L Action

Areas of the plant in which Thermo-Lag 330 fire barrier material is installed to protect either small diameter conduit (smaller than 4 inches) and wide cable trays (width greater than 14 inches) that provide safe shutdown capability have been identified.

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NRC Requested Action #2

In those plant areas in which Thermo-Lag fire barriers are used to protect wide cable trays, small conduits, or both, the licensee should implement, in accordance with plant procedures, the appropriate compensatory measures, such as fire watches, consistent with those which would be implemented by either the plant technical specifications or the operating license for an inoperable fire barrier.

PP&L Action

Prior to the completion of our evaluation of the bulletin, precautionary fire watches were established within the plant in response to the NRC's recommendations. Upon completion of our evaluation, all pre-formed and sprayed-on Thermo-Lag barriers used to protect both small conduit and wide cable trays as defined in Item #1 above were declared inoperable and required technical specification actions implemented. A one-hour report pursuant to 10CFR50.72 was made to the NRC.

NRC Requested Action #3

Each licensee, within 30 days of receiving this bulletin, is required to provide a written notification stating whether it has or does not have Thermo-Lag 330 fire barrier systems installed in its facilities. Each licensee who has installed Thermo-Lag 330 fire barriers is required to inform the NRC, in writing, whether it has taken the above actions and is required to describe the measures being taken to ensure or restore fire barrier operability.

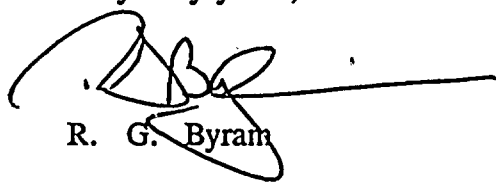
PP&L Action

As stated above in the response to Item #2, PP&L has declared all Thermo-Lag barriers used to protect both small conduit and wide cable trays as defined in Item #1 above to be inoperable. Required technical specification actions have been implemented. A report pursuant to 10CFR50.72 has been made to the NRC.

PP&L also recognizes the need to promptly resolve the questions regarding the effectiveness of Thermo-Lag as a fire barrier at Susquehanna. Accordingly, we are researching and documenting available test information to demonstrate the capability of Thermo-Lag to function in all specific configurations at SSES (i.e., not solely those defined by the bulletin). Where such information is found to be deficient, PP&L will conduct appropriate additional testing. It is currently anticipated that actual testing will begin within the next few months; we will keep the SSES Project Manager and Sr. Resident Inspector informed as the plan and schedule become more clearly defined. Contingency plans will be in place to address any test failures that occur. Compensatory actions currently in place will remain in effect until barriers can be demonstrated operable.

Should you have any questions, please call Mr. W.W. Williams at (215) 774-5610.

Very truly yours,



R. G. Byram

Attachment

cc: NRC Region I
Mr. G. S. Barber, NRC Sr. Resident Inspector
Mr. G. F. Maxwell, Acting NRC Project Manager

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)
: SS
COUNTY OF LEHIGH)

I, ROBERT G. BYRAM being duly sworn according to law, state that I am Vice President - Nuclear Operations of Pennsylvania Power & Light Company and that the facts set forth on the attached response to NRC Bulletin 92-01, are true and correct to the best of my knowledge, information and belief.

Robert G. Byram
Vice President - Nuclear Operations

Sworn to and subscribed
before me this 24 day
of July , 1992.

Notary Public

Notarial Seal
Martha C. Sedora, Notary Public
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