

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9208110048 DOC. DATE: 92/08/05 NOTARIZED: NO DOCKET #
 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylvania 05000387
 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylvania 05000388
 AUTH. NAME AUTHOR AFFILIATION
 KEISER, H.W. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 MILLER, C.L. Project Directorate I-2

SUBJECT: Requests approval to use CCTV as means of satisfying TS requirement for continuous fire watch in lock radiation areas at facilities where Therm-Lag fire barriers declared inoperable, per NRC Bulletin 92-001.

DISTRIBUTION CODE: A006D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: OR/Licensing Submittal: Fire Protection

NOTES: LPDR 1 cy Transcripts. ; MAXWELL, G 05000387
 LPDR 1 cy Transcripts. ; MAXWELL, G 05000388

	RECIPIENT		COPIES			RECIPIENT		COPIES	
	ID CODE/NAME		LTTR	ENCL		ID CODE/NAME		LTTR	ENCL
	PD1-2 LA		1	0		PD1-2 PD		1	1
	RALEIGH, J.		2	2					
INTERNAL:	ACRS		3	3		NRR WERMEIL, J		1	0
	NRR/DST 8E2		1	1		NRR/DST/SPLB8D1		1	1
	NUDOCS-ABSTRACT		1	1		OC/LEMB		1	0
	OGC/HDS2		1	0		<u>REG FILE</u> 01		1	1
EXTERNAL:	NRC PDR		1	1		NSIC		1	1
NOTES:			2	2					

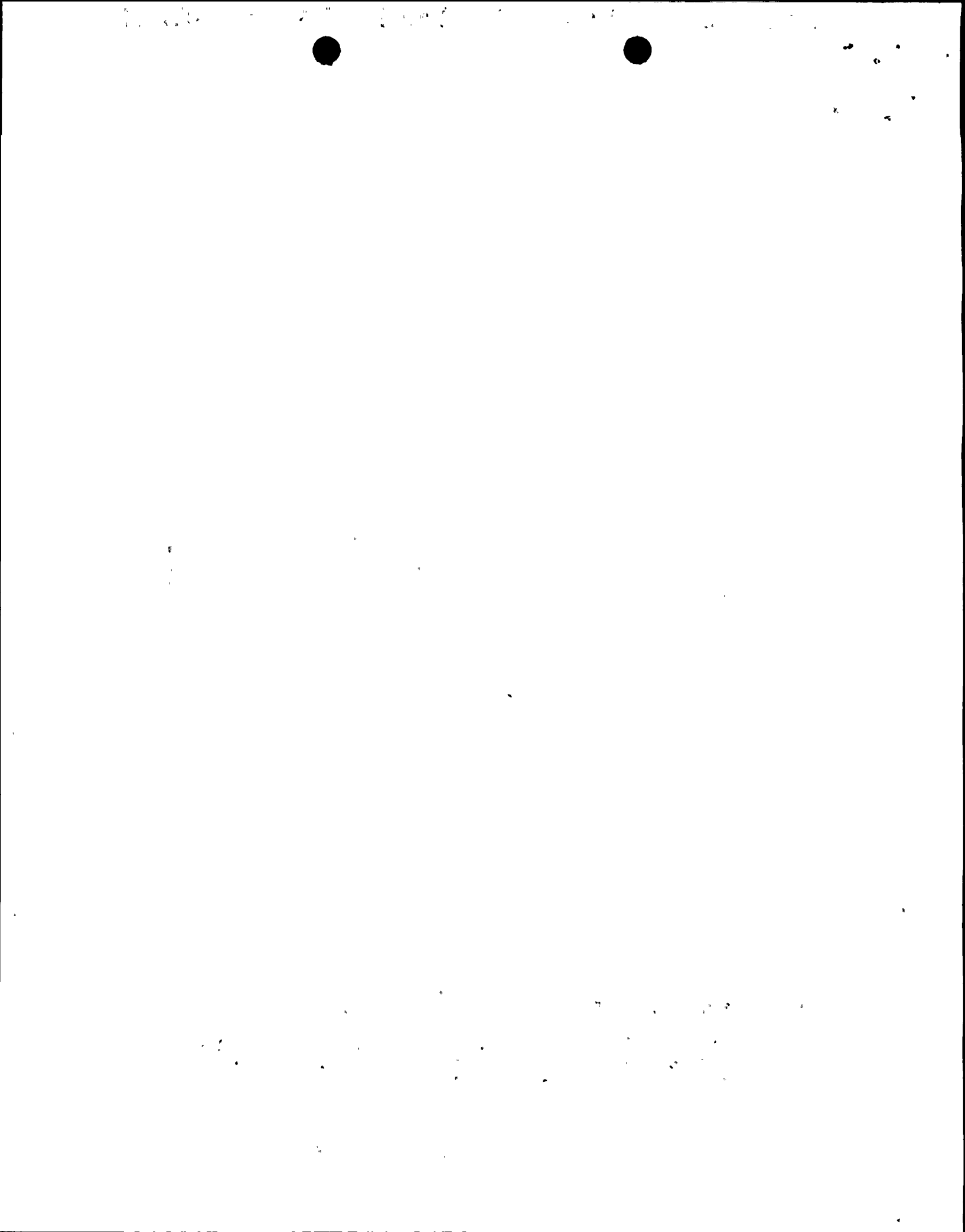
NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 18 ENCL ~~14~~ 0

R
I
D
S
/
A
D
D
S

R
I
D
S
/
A
D
D
S





Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 215/774-5151

Harold W. Keiser
Senior Vice President-Nuclear
215/774-4194

AUG 0 5 1992

Director of Nuclear Reactor Regulation
Attention: Mr. C. L. Miller, Project Director
Project Directorate I-2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

**SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST TO USE CLOSED CIRCUIT TELEVISION
TO SATISFY THE REQUIREMENT FOR CONTINUOUS
FIRE WATCHES
PLA-3819**

FILE R41-2

Docket Nos. 50-387
and 50-388

Dear Mr. Miller:

This letter requests NRC approval to use Closed Circuit Television (CCTV) as a means of satisfying the technical specification requirement for a continuous fire watch in locked radiation areas at Susquehanna SES where Thermo-Lag fire barriers have been declared inoperable in response to NRC Bulletin 92-01. These areas consist of the following: Fire Zone 2-3C-W, Fire Zone 2-3C-N, Fire Zone 2-5C and Fire Zone 1-6I.

This request is being made as a precautionary action in the event fire detection capability in these areas would become inoperable; we are currently satisfying all technical specification compensatory actions required as a result of having declared Thermo-Lag fire barriers inoperable. We have evaluated the use of CCTV and find it acceptable. As a result of discussions with members of your staff we are providing this request to use CCTV as a means of performing a continuous fire watch for your review and approval.

NRC Bulletin 92-01, "Failure of Thermo-Lag 330 Fire Barrier System to Maintain Cabling in Wide Cable Trays and Small Conduits Free from Fire Damage" issued on June 24, 1992 and our subsequent evaluation of Thermo-Lag installations utilized at Susquehanna SES has led us to declare Thermo-Lag fire barriers protecting small diameter conduit (smaller than 4 inches) and wide cable tray (width greater than 14 inches) to be inoperable. Susquehanna Steam Electric Station Technical Specification 3/4.7.7 requires all fire rated assemblies to be operable at all times. With one or more of the required fire rated

9208110048 920805
PDR: ADOCK 05000387
Q PDR

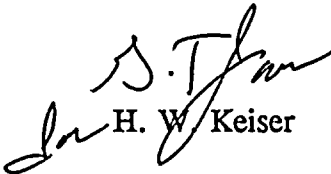
A006
1/0

assemblies inoperable, a continuous fire watch must be established within one hour on at least one side of the affected assembly, or fire detector operability must be verified on at least one side of the inoperable fire assembly and an hourly fire watch established.

Since the fire detectors in the affected fire zones are currently operable, hourly fire watches were established to compensate for the inoperability of the barriers. Upon further consideration we chose to address our ability to promptly respond to a loss of detection capability in combination with the loss of fire barriers before the condition presented itself. Since this condition would require a continuous fire watch for fire areas in inaccessible locked radiation areas, ALARA is a concern. Therefore, after appropriate evaluation CCTV camera systems have been staged (i.e., they are not currently in use) in the fire zones of concern to permit continuous observation should that become necessary. The CCTV camera systems provide the capability for performing a fire watch by permitting remote observation of an inoperable fire barrier and the general area surrounding the fire barrier. The use of CCTV reduces personnel radiation exposure and, therefore, represents good ALARA practices. This action also provides a level of protection adequate to compensate for the inability to post a fire watch within the fire area, and, therefore, in our judgement, fully meets the intent of the Technical Specification actions.

We request your expedited attention to this request to use CCTV as a means of satisfying the technical specification requirement for a continuous fire watch in those areas of concern. Should you have any questions regarding this request, please contact Mr. W.W. Williams at 215-774-5610.

Very truly yours,


H. W. Keiser

cc: ~~NRC Document Control Desk~~ (original)
NRC Region I
Mr. G. S. Barber, NRC Sr. Resident Inspector
Mr. J. J. Raleigh, NRC Project Manager

