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Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC Bulletin 92-001, "Failure of Thermo-Lag 330

Fire Barrier Sys to Maintain Cabling in WidCable Trays & Small Conduits Free from Fire Damage." Subj matl not

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

July 28, 1992 G02-92-179

Docket No. 50-397

U.S. Nuclear Regulatory Commission

Attn: Document Control Desk Washington, D.C. 20555

Gentlemen:

Subject:

WNP-2, OPERATING LICENSE NPF-21

RESPONSE TO IE BULLETIN 92-01

Reference:

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", dated June 24, 1992

This letter responds to the three requested actions of the reference IE Bulletin.

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.

Response

WNP-2 uses both 1 and 3-hour pre-formed Thermo-Lag 330 fire barrier material. The use of this material was identified by the Supply System in response to our review of IE Notices 91-47 and 91-79 and resulting concerns regarding the qualification of certain Thermo-Lag configurations. This identification was not specific to small diameter conduit (less than 4-inches) or cable trays of greater that 14 inches, as most of the WNP-2 applications of this Thermo-Lag material satisfy this description.

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Page Two
RESPONSE TO IE BULLETIN 92-01

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.

<u>Response</u>

Following review of IE Notices 91-47 and 79, one hour fire tours were established for areas using certain Thermo-Lag barrier configurations. Review of IE Bulletin 92-01 resulted in the addition of some areas to the tour. The use of a one hour tour, preceded by verification of the operability of fire detectors in the affected areas, is consistent with the fire protection requirement that was originally located in the WNP-2 Technical Specifications. The WNP-2 Fire Protection Technical Specification requirements have now been relocated to the FSAR (Appendix F, Section F.5) as provided for by Generic Letter 88-12 and WNP-2 License Amendment 67.

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.

Response

WNP-2 does use Thermo-Lag 330 fire barrier material. The Requested Actions 1 and 2 have been taken by the Supply System for WNP-2. Appropriate actions to restore barrier operability are being developed through an industry program being coordinated by NUMARC. This program will include establishment of a test database, development of guidance for applicability of tests, development of generic installation guidance, and consideration and coordination of additional testing as appropriate. We will apply the results of these efforts, when completed, to the Thermo-Lag installations that are within the scope of IE Bulletin 92-01.

Sincerely.

G. C. Sorensen, Manager

Regulatory Programs (Mail Drop 280)

AGH/bk

cc: JB Martin - NRC RV

NS Reynolds - Winston & Strawn

RR Assa - NRC

DL Williams - BPA/399 B Bradley - NUMARC NRC Site Inspector - 901A STATE OF WASHINGTON)
COUNTY OF BENTON

Subject: Response to IEB 92-01

I. G. C. SORENSEN, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

DATE 28 July, 1992

G. C. Sorensen, Manager Regulatory Programs

On this date personally appeared before me G. C. SORENSEN, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this <u>88 th</u>day of _

__1992.

Notary Public in and for the

STATE OF WASHINGTON

Residing at Kennewick, Washington

My Commission Expires April 28, 1994

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ML14350A146

Unanalyzed Failed Modes Discovered for Containment Nitrogen System Caused by Inadequate Design Procedures. Dated November 14, 1991.

431-97-0141 Box #10