

Georgia Power Company  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201  
Telephone 205 877-7122

C. K. McCoy  
Vice President, Nuclear  
Vogtle Project



Georgia Power

*the southern electric system*

December 19, 1994

LCV-0072-F

Docket Nos. 50-424  
50-425

TAC Nos. M85619  
M85620

U. S. Nuclear Regulatory Commission  
ATTN.: Document Control Desk  
Washington, D. C. 20555

**VOGTLE ELECTRIC GENERATING PLANT  
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
REGARDING GENERIC LETTER 92-08, THERMO-LAG FIRE BARRIERS**

By letter dated September 23, 1994, the NRC acknowledged receipt of Georgia Power Company's (GPC) previous response, acknowledged that the Nuclear Energy Institute (NEI) has now issued the industry guidance documents, provided information on the NRC's course of action to resolve the Thermo-Lag issue, and requested GPC to provide additional information pursuant to 10 CFR 50.54(f) within 90 days of the date of this letter. Specifically, GPC's previous response had deferred the submittal of the requested information until transmittal of the NEI guidance documents for the responses to Section II, "Important Barrier Parameters," Section III, "Thermo-Lag Fire Barriers Outside The Scope Of The NUMARC Program," Section IV, "Ampacity Derating," and Section VI, "Schedules." The NRC's letter also stated that a performance based approach, as indicated in Section V of GPC's response, was not acceptable to achieve compliance with NRC fire protection requirements in the areas that contain Thermo-Lag.

GPC has reviewed the industry guidance documents for upgrading the Thermo-Lag fire barriers to restore the operability of these barriers and also to address the ampacity derating issue. GPC has also evaluated resolution processes involving physical circuit modifications and safe shutdown equipment re-evaluations as alternatives to upgrading the existing Thermo-Lag fire barriers. Based on these reviews, GPC has determined that continued reliance on Thermo-Lag fire barriers is not desirable. Consequently, GPC has developed a program to resolve the Thermo-Lag issue through circuit rerouting, the re-evaluation of the safe shutdown equipment requirements, and possible redefinition of existing fire areas.

9412290141 941219  
PDR ADDOCK 05000424  
P PDR

ADD 1/0

Georgia Power Company anticipates these re-evaluations and physical modifications will be acceptable under the provisions of 10CFR 50.59 and additional submittals requiring NRC staff evaluation will not be necessary. License Condition F (NPF-68) and License Condition G (NPF-81) require prior NRC approval for changes that could adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

In response to the information requested by the NRC's letter dated September 23, 1994, pursuant to 10 CFR 50.54 (f) and in accordance with GPC's commitments to submit a supplemental response for the fire endurance issues, GPC will resolve the Thermo-Lag issue by eliminating reliance on Thermo-Lag as a fire barrier material. The method for achieving compliance is as described previously. Georgia Power Company will complete the required evaluations and modifications to resolve the Thermo-Lag issue for VEGP for both Unit 1 and Unit 2 by startup of Unit 2 from the Spring 1998 refueling outage. The continued use of Thermo-Lag as a radiant energy heat shield material is also being evaluated.

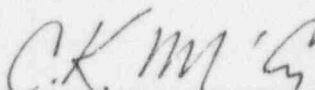
In response to the request for information regarding ampacity derating, GPC will not use Thermo-Lag as a fire barrier raceway wrap. However, Thermo-Lag may physically remain within the plant. Consequently, ampacity derating will not be related to the acceptability of the material as a fire rated barrier. However, ampacity derating will be used to determine the need to physically remove the Thermo-Lag barriers. In this case, the ampacity derating for the baseline configuration will be addressed and resolved consistent with the information provided by the NEI test program and NRC Information Notice 92-46, "Thermo-Lag Fire Barrier Material Special Review Team Report Findings, Current Fire Endurance Tests and Ampacity Calculation Errors." For those circuits where ampacity derating does not meet established acceptance criteria, such as power circuits, the Thermo-Lag barriers will be physically removed.

These commitments supersede GPC's previous commitments related to information requests and corrective actions associated with the Thermo-Lag fire barrier issue. Georgia Power Company will continue to maintain fire patrols in appropriate areas until the Thermo-Lag issue is resolved. This measure provides adequate interim assurance of safe shutdown capability until the requirement for Thermo-Lag fire barriers is eliminated by the previously described program.

Mr. C. K. McCoy states he is a vice president of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

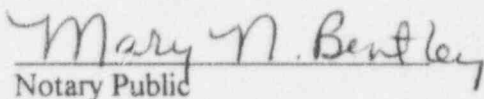
GEORGIA POWER COMPANY

By:



C. K. McCoy

Sworn to and subscribed before me this 19<sup>th</sup> day of December, 1994.

  
Notary Public

CKM/PAH/gmb

cc: Georgia Power Company  
Mr. J. B. Beasley, Jr.  
Mr. M. Sheibani  
NORMS

U. S. Nuclear Regulatory Commission  
Mr. S. D. Ebnetter, Regional Administrator  
Mr. F. Hood, Licensing Manager, NRR  
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle