

### GULF STATES UTILITIES COMP

RIVER BEND STATION POST OFFICE BOX 220 51 FRANCISVILLE LOUISIANA 70776 AREA CODE 504 635-6094 346 8651

> December 27 , 1991 RBG- 36,177 File Nos. G9.5, G9.25.1.3

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

Gentlemen:

## River Bend Station - Unit 1 Docket No. 50-458

Please find enclosed Supplement 4 to Licensee Event Report No. 90-003 for River Bend Station - Unit 1. This revision is submitted to provide the current status of issues concerning Thermo-Lag fire barriers at River Bend Station.

Sincerely,

FOR W. H. Odell Manager - Oversight River Bend Nuclear Group

DA POR SOB DAY LAE/PDG/GAB/DCA/RJK/KVM

cc: U.S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 1000 Arlington, TX 76011

> NRC Resident Inspector P.O. Box 1051 St. Francisville, LA 70775

INPO Records Center 1100 Circle 75 Parkway Atlanta, GA 30339-3064

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# LICENSEE EVENT REPORT (LER)

# TEXT CONTINUATION

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#### REPORTED CONDITION

During the performance of Surveillance Test Procedure STP-000-3602 on 02/06/90 through 02/08/90 with the unit in Operational Condition 1 (full power), it was found that several minor deficiencies existed in the Thermo-Lag fire barrier envelopes around redundant safe shutdown circuits. These deficiencies consisted of small holes, cracks and unfilled seams in the Thermo-Lag material. Condition reports (CR) 90-0094, 90-0095, 90-0101, and 90-0106 were initiated to evaluate the conditions according to 10CFR50, Appendix R, fire barrier requirements. A fire watch had already been established in areas utilizing Thermo-Lag as a fire barrier, thus Technical Specification Section 3/4.7.7 action statement requirements had already been fulfilled. Since these deficiencies rendered the fire barrier inoperable and the unfilled seams existed since construction, this event is reportable pursuant to 10CFR50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications.

This supplement to LER 90-003 is submitted to provide a status of the Thermo-Lag issue at River Band Station.

#### INVESTIGATION

IRC Parm 208A IB-89

Thermo-Lag fire barriers have been under review at River Bend Station since late 1985. Potential discrepancies between the installation manual of Thermal Science Incorporated (TSI) (a GSU subcontractor during construction) and the actual site installation practices, and discrepancies between TSI installation manual and the qualification fire test results were discovered at that time. Due to these issues, the fire barriers were indeterminate for operability and firewatches were established for all areas utilizing Thermo-Lag as a fire barrier. An Informational Report was submitted to the NRC on 01/09/90 concerning this subject.

The performance of STP-000-3602 was intended to identify conditions in fire barriers where normal wear and tear had caused damage to the barriers. The small holes and miscellaneous cracks that were identified during the performance of the STP fall into this category. Normally a fire watch would be established and the holes and cracks would be repaired. However, the unfilled seams in the Thermo-Lag installations that were identified during the performance of the STP are a condition that must have existed from the time of initial construction and are not in accordance with either the vendor installation manual, nor normal site practices. In accordance with the vendor manual, the seams between boards of Thermo-Lag were to be prebuttered with a trowel grade material and then joined, or

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alternatively, dry fitted together with trowel grade material then applied to the joint. In either case, the seams were to have been grouted with the trowel grade material and they were not. The preexisting firewatches satisfy the action statement of section 3/4.7.7 of the Technical Specifications. Eight fire areas were identified by the condition reports as having Thermo-Lag barriers exhibiting the unfilled seams. A briff description of each area follows.

Fire area C2A is the southeast cable chase at elevation 70 feet of the control building (\*NA\*). Fire area C2C is in the same cable chase but located at elevation 115 feet. These areas have safety related cabling feeding through up to the termination cabinets in the main control room. The areas have sprinkler suppression systems (\*KP\*) on the cable trays, which comprise the exposed fixed combustible in the areas. Area C6 is adjacent to area C2A on the west side. The area contains safety related air accumulators as well as safety related cabling. The exposed cables in cable trays, which comprise the exposed fixed combustible in the area, are protected by a sprinkler suppression system.

Fire area AB2/22 is located in the auxiliary building (\*NF\*) at elevation 95 feet in the southeast corner of the building. The area contains safety related instruments, piping and safety related cables. The tabling, which makes up the fixed combustible in the area, represents a fire loading of 1 0 hour. Fire area AB7 is the "D" tunnel located at elevation 70 feet on the south end of the auxiliary building. Safety related piping and motor operated valves (MOV) (\*FCV\*) are located in the area in addition to the safety related cabling. The cable trays and the MOVs are protected by a water deluge sprinkler system (\*KP\*).

Fire area FB1/Z1 is located at elevation 70 feet of the fuel building (\*ND\*). The area contains fuel pool cocling piping (\*DA\*) and equipment, reactor plant component cooling water piping (\*CC\*) and MOVs as well as safety related cabling. The crescent area, near the reactor building shield wall (\*NH\*), contains the major portion of the cable trays in the area. The cable trays represent a fire loading of 21 minutes and are the fixed combustible in the area. Fire areas FB3 and FB4 are the charcoal filter rooms located at elevation 148 feet of the fuel building. The ventilation system charcoal filters and fans are contained in the area. All cabling is routed in conduit in these areas. The charcoal filters are the fixed combustible for this area. They are protected by manually actuated water spray systems. The charcoal in each area is a fire loading of 45 and 46 minutes respectively for areas FB3 and FB4.

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Fire area PT1 is the pipe tunnel at elevation 70 feet which extends from the standby cooling tower (\*CTW\*) to the fuel building. The area contains piping, MOVs, and instrumentation in addition to the safety related cabling. The cable trays are the only fixed combustible in the area and are protected by a sprinkler suppression system. The cable trays represent a fire loading of 29 minutes.

In addition to the Informational Report submitted on 01/09/90, LERS 87-005 and 89-009 were reviewed for similarity. This is the first time unfilled seams have been identified.

### CORRECTIVE ACTION

GSU has conducted a series of fire endurance tests in accordance with ASTM E119, followed by water hose stream tests, using American Nuclear Insurer's Bulletin B.7.2, 11/87, Attachment B. Electrical circuit integrity monitoring was also performed throughout the fire endurance and water hose stream tests. These tests were done with the cooperation of the vendor, Thermal Science Incorporated. The tests were performed in two stages. The first stage consisted of duplicating the installation process that was used at River Bend for barriers on conduit, cable tray, supports and enclosures. Each item was tested in both a one hour and a three hour barrier configuration.

The results of the in situ tests are as follows:

Test Article	Duration of Test	Test Rosults
1 Hour Conduit 3 Hour Conduit 1 Hour Cable Tray 3 Hour Cable Tray 1 Hour Unistrut Support 3 Hour Unistrut Support 1 Hour Vault Enclosure 3 Hour Vault Enclosure	25 minutes 1 hour : 25 minutes 13 minutes 56 minutes 1 hour : 5 minutes 3 hour : 0 minute 1 hour : 2 minutes 2 hour : 37 minutes	Fail * Fail Fail Pass Pass Fail

\* Test stopped at GSU request.

Three (3) Thermo-Lag test articles successfully passed in their in situ configuration. Rework will not be required for these barriers.

The second stage consisted of additional tests of upgraded configurations of the failed in situ articles. The results of the upgraded tests are as follows:

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# Test Article

### Duration of Test

### Test Regults

1	Hour	Conduit	1	hour	-	5 minutes	Pass
3	Hour	Conduit	3	hour	3	4 minutes	Pass
1	Hour	Cable Tray	1	hour	1	0 minutes	Pass
3	Hour	Cable Tray	1	hour	1	45 minutes	Fail
3	Hour	Vault Enclosure	3	hour	:	C minutes	Pass

The tests of the upgraded configurations were successful, with the exception of the 3 hour cable tray test article. Based on the successful tests of the upgraded Thermo-Lag barriers, rework will be performed as follows:

# Configurations Needing Upgrade

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- 3 Hour Conduit
- 1 Hour Cable Tray
- 3 Hour Vault Enclosure

The rework of the above Thermo-Lag configurations will be included in the scope of work of the fire barrier task force. The fire barrier task force was formed in response to Corrective Action Report (CAR) -5-8901 to address the problem of deficient fire barrier penetration seals. As described in revision 3 to LER 89-010, inspection, evaluation and corrective actions for safety-related fire barrier penetration seals are scheduled to be completed prior to January, 1994. However, engineering evaluation of the proposed upgrades show that there is a potential to exceed existing cable ampacity ratings by applying additional Thermo-lag material. If it becomes necessary to revise cable size or reroute cables this activity may require implementation past the presently scheduled implementation date of January 1994.

Following resolution of the ampacity issues, GSU will issue a procedure to instruct persons in the application of the upgrade process which was successfully tested in the fall of 1990. Until the improvements are in place, roving one-hour fire watches will remain.

As previously described, the only failure of the upgraded test articles was the three-hour cable tray. Following the initial tests a third three-hour cable tray test article was constructed using information obtained during the evaluation of the two previous failures. When tested, this configuration failed in 2 hours and 55

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minutes. After two unsuccessful attempts to design an acceptable upgrade for the three-hour cable tray, methods other than applying additional layers of Thermo-Lag to the <u>in situ</u> enclosures were explored. As a result of this investigation, the 3M Interam protective envelope system has been selected as the method to protect three-hour Appendix R cable trays. The existing Thermo-Lag 330 system will be removed and replaced with the 3M Interam system. Currently, GSU is reviewing 3M qualification test reports and installation instructions in order to prepare a site specific procedure for installation.

Due to the higher ampacity derating of the Interam system when compared to Thermo-Lag, GSU will evaluate the cables within the affected raceways to determine if the installed cables can carry their designed current and re-rate cables as required. GSU will also review the structural adequacy of the cable trays due to the greater weight of the 3M Interam material. If it becomes necessary to revise cable size or reroute cables this activity may require implementation past the presently scheduled implementation date of January 1994.

#### BAFETY ASSESSMENT

The primary fixed combustible at River Bend in the areas containing the Thermo-Lag fire barrier material is cable jacketing on the electrical cables. The predominant type of cable used at River Bend is IEEE 383 rated which is resistant to ignition and is fire retardant.

Automatic fire detection systems are located in all areas, providing early detection if a fire should occur. Detection is provided by ionization and/or thermal type detectors.

Procedure FPP-0040 establishes controls for the use of transient combustibles throughout the protected area. The hot work permit procedure, FPP-0060, establishes controls associated with ignition sources.

In the areas containing one-hour rated barriers, automatic fire suppression systems are in place. Actuation of sprinkler systems in areas with open heads would occur upon a signal given by the detection system. In areas protected by a wet pipe system, sprinkler heads are fused to actuate at a temperature of 165 degrees Fahrenheit. The Thermo-Lag barrier failed in the fire test at a furnace temperature of approximately 1400 degrees Fahrenheit. Actuation of the sprinkler

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systems would be expected well before temperatures could rise to the 1400 degrees Fahrenheit range and provide protection for the required circuits.

Also, as compensatory action in accordance with Technical Specification Section 3/4.7.7, a one-hour fire watch patrol has been in effect for the areas containing Thermo-Lag barriers since November 1989 as a result of Condition Report (CR) 89-1144. The actions of the fire watch are two fold. First, the patrols are to monitor an area for conditions likely to start and/or spread fire and for compliance with housekeeping requirements. These actions are designed to maintain the combustible loading in each area at the acceptable levels. The second function is to inspect for evidence of fire. The objective is to discover indications of a fire prior to activation of the detection system. Based on the discussion above, the defense-indepth approach utilized on-site provides assurance that plant safety and the health and safety of the public is not compromised.

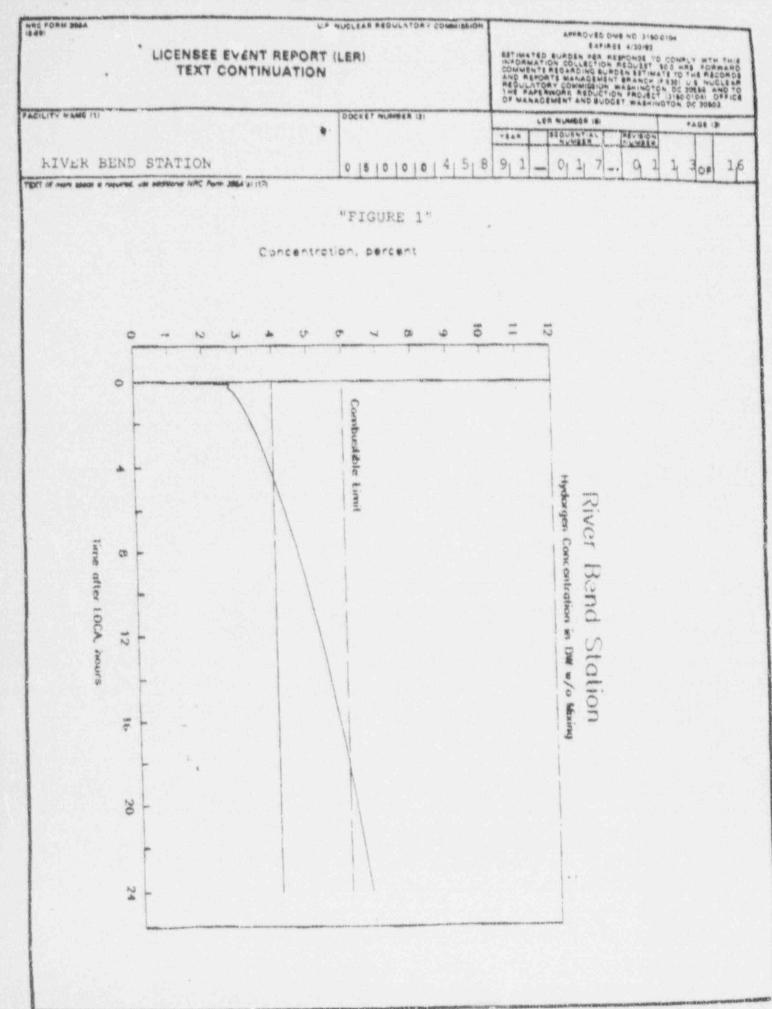
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# TO:NRC WHITE FLINT P137

JAN 17, 1992 11:13AM #949 P.23



# FROM: GSU PURCHASING TO: NRC WHITE FLINT P137 JAN 17, 1992 11:14AM #949 P.24

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# Table 1 Post-LUCA Hydrogen Mixing Seguence of Events

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5	Drywell hydrogen > 2% and Reactor pressure < 30 psic
30	Operator unsuccessfully attempts to start hydrogen mixing
270 (4.5 hours)	Drywell hydrogen > 4% (possible ignition of pockete of hydrogen - No explosions)
1020 (17 hours)	Drywell hydrogen > 6% (pessible global combustion - No explosions)

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FROM: BSU PURCHRSING TO: NRC WHITE FLINT P137 JAN 17, 1992 11:14AM #949 P.25

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\* Reg Guide 1.7 hydrogen due to MWR = 20.8 lbs

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ECCS Combinations	Conditional Probability
1 HPCS Pump, 2 LPCI Pumps, and 1 LPCS Pump Operating	1.09E-01
3 LPCI Pumps and 1 LPCS Pump Operating	5.29E-02
1 HPCS Pump and 3 LPCI Pumps Operating	4.90E-02
1 HPCS Pump and 2 LPCi Pumps Operating	6.06E-03
2 LPCI Pumps and 1 LPCS Pump Operating	5.93E-03
1 HPCS Pump, 1 LPCI Pump and 1 LPCS Pump Operating *	5.81E-03
3 1 PCI Pumps Operating	2.698-03
1 HPCS Pump and 1 LPCS Pump Operating	1.12E-03
1 HPCS Pump Operating	5.79E-04
2 LPCI Pumps Operating	3.198-04
1 LPCI Pump and 1 LPCS Pump Operating	2.97E-04
1 HPCS Pump and 1 LPCI Pump Operating	2.75E-04
1 LPCS Pump Operating	4.97B-05
1 LPCI Pump Operating	4.53E-06

# TABLE 3

\* ECCS DBA Configuration