

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

July 23, 1992

ELV-03897
002005

Docket Nos. 50-424
50-425

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
RESPONSE TO NRC BULLETIN NUMBER 92-01

On June 24, 1992, the NRC issued Bulletin Number 92-01, "Failure of Thermo-Lag 330 Fire Barrier System to Maintain Cabling in Wide Cable Trays and Small Conduits Free from Fire Damage." The bulletin notified licensees of failures in fire endurance testing of the Thermo-Lag 330 fire barrier system and requested all licensees to take specific actions.

The enclosure to this letter describes the actions which have been taken at Vogtle Electric Generating Plant (VEGP) in response to NRC Bulletin Number 92-01 and the measures being taken by Georgia Power Company (GPC) to ensure or restore fire barrier operability.

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

GEORGIA POWER COMPANY

By: CKM/G

Sworn to and subscribed before me this 23rd day of July, 1992.

Mary N. Bentley
Notary Public

MY COMMISSION EXPIRES NOV 6, 1994

CKM/PAH/gmb

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U. S. Nuclear Regulatory Commission
ELV-03897
Page 2

xc: Georgia Power Company
Mr. W. B. Shipman
Mr. M. Sheibani
NORMS

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

ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT
RESPONSE TO NRC BULLETIN NUMBER 92-01

Bulletin 92-01, Item 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 (sic) 14 inches) that provide safe shutdown capability."

GPC Response to Item 1:

On the evening of June 25, 1992, Georgia Power Company (GPC) received a facsimile copy of NRC Bulletin No. 92-01 which was delivered by the Resident Inspector to the Manager of Technical Support. Vogtle Electric Generating Plant (VEGP) personnel immediately initiated actions in response to this bulletin.

The architect engineer (AE) was contacted and requested to begin a review of drawings and other documentation to determine the areas of the plant which have Thermo-Lag 330 fire barrier material installed on small diameter conduit (less than 4 inches) or wide cable trays (greater than 14 inches) which provide safe shutdown capability. The following areas were identified as meeting the criteria of the bulletin:

<u>Unit</u>	<u>Room</u>	<u>Fire Area/Zone</u>	<u>Description</u>
1	R-C95	*1-AB-LD-A/11B	Train B Pipe Chase @ EL-143' 6"
1	R-B42	**1-CB-LC-B/138	Lobby @ EL-180' 0"
1	R-B50	**1-CB-LC-B/80	Non-Train Swgr Room @ EL-180' 0"
1	R-157	**1-CB-L1-A/106	Control Room Toilet @ EL-220' 0"
1	R-158	**1-CB-L1-A/106	Control Room Kitchen @ EL-220' 0"
1	R-B77	**1-CB-LB-D/65	Train B Corridor @ EL-180' 0"

* AB indicates Auxiliary Building

** CB indicates Control Building

ENCLOSURE (CONTINUED)

RESPONSE TO NRC BULLETIN NUMBER 92-01

<u>Unit</u>	<u>Room</u>	<u>Fire Area/Zone</u>	<u>Description</u>
2	R-C23	*2-AB-LD-A/11B	Train B Pipe Chase @ EL-143' 6"
2	R-A22	**2-CB-LA-X/94	Aux Relay Room @ EL-200' 0"
2	R-A63	**1-CB-LA-U/154	30kVA Inverter Room @ EL-200' 0"
2	R-B33	**2-CB-LC-B/80	Non-Train Swgr Room @ EL-180' 0"

In letter ELV-03871 dated June 30, 1992, Georgia Power Company identified five rooms inside containment (Unit 1 -A02, B02 and B03 and Unit 2 -B02 and B03) which contain conduit coated with Thermo-Lag 330 insulation. As a compensatory measure, on June 27, 1992, GPC initiated a program to monitor the temperature inside containment at least once per hour using the instrumentation listed in Technical Specification 4.6.1.5. During a telephone conversation with the NRC staff on July 7, 1992, it was determined that the use of Thermo-Lag as a radiant energy shield was not within the scope of this bulletin. A review was then initiated to determine if the Thermo-Lag inside containment was installed as a fire barrier or as a radiant energy shield. Our review determined the Thermo-Lag was installed as a radiant energy shield. Additionally, section 2.6.1.4 of Appendix Q of Safety Evaluation Report Supplement (SSER) Number 4 (NUREG-1137) discussed the containment fire area. In SSER No. 4, the NRC indicated that GPC has installed acceptable radiant energy shields where required to separate safe shutdown equipment in accordance with Branch Technical Position CMEB 9.5-1, section C.7.a (1)(b).

Based on the above discussion, Georgia Power Company has terminated the hourly monitoring of the air temperature inside containment.

Bulletin 92-01, Item 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."

* AB indicates Auxiliary Building

** CB indicates Control Building

ENCLOSURE (CONTINUED)

RESPONSE TO NRC BULLETIN NUMBER 92-01

GPC Response to Item 2:

The VEGP fire protection program requirements are contained in Final Safety Analysis Report (FSAR) table 9.5.1-10, "Fire Protection Operability Requirements." On table 9.5.1-10 (sheet 10 of 11) concerning fire-rated assemblies, action statement 7.3 states:

"With one or more of the above required fire barriers and/or fire-rated assemblies inoperable, within 1 h either establish a continuous fire watch on at least one side of the affected assembly, or verify the operability of fire detectors at least one side of the inoperable assembly and establish an hourly fire patrol."

It has been determined that the areas listed in item 1 contain fire detectors and they are operable. Therefore, in accordance with action statement 7.3, GPC established the appropriate 1-hour fire patrols on June 27, 1992. These fire patrols will remain in place until this issue is resolved.

Bulletin 92-01, Item 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."

GPC Response to Item 3:

Appropriate actions to restore fire 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 of 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 within the scope of Bulletin 92-01.