



**CENTERIOR
ENERGY**

PERRY NUCLEAR POWER PLANT

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Michael D. Lyster
VICE PRESIDENT - NUCLEAR

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

Perry Nuclear Power Plant
Docket No. 50-440
Response to 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

Gentlemen:

On June 24, 1992, the Perry Nuclear Power Plant received the subject NRC Bulletin concerning test failures associated with Thermo-Lag 330 fire barrier systems. NRC Bulletin 92-01 requested licensees to identify areas where suspect Thermo-Lag barriers are installed and to ensure that compensatory measures are implemented where appropriate. The enclosed response to NRC Bulletin 92-01 is written to satisfy the additional notification requirement contained in the Bulletin.

Compensatory measures had previously been implemented as part of corrective actions for Licensee Event Reports (LERs) 91-020 and 91-020-01 which were transmitted to the NRC on November 5, 1991 and January 3, 1992 respectively. The referenced LERs reported installation deviations associated with Thermo-Lag fire barriers. Due to the various unresolved Thermo-Lag issues which have arisen to date, existing compensatory measures will remain in effect until permanent corrective actions regarding these issues are determined and implemented.

If you have questions regarding this correspondence, please contact Mr. Kevin P. Donovan, Licensing and Compliance Section Manager at (216) 259-3737, extension 5606.

Sincerely,

Frank R Stead for
Michael D. Lyster

MDL:RWG:ss

Attachment

cc: NRC Project Manager
NRC Resident Inspector Office
NRC Region III

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

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TEHA

RESPONSE TO NRC BULLETIN 92-01
FOR
PERRY NUCLEAR POWER PLANT
UNIT NUMBER 1

This letter is submitted in conformance with Section 182a of the Atomic Energy Act of 1954, as amended, and 10 CFR 50.54(f). Enclosed is the Perry response to NRC Bulletin 92-01, Failure of Thermo-Lag 330 Fire Barrier System To Maintain Cabling in Wide Trays and Small Conduits Free from Fire Damage.

By. Frank R. Stead
Frank R. Stead, Director
Perry Nuclear Support Department

Sworn and subscribed before me this 24th day of July 1992.

Sheryl A. Eckelberry
Notary Public, State of Ohio

SHERYL A. ECKELBERRY
Notary Public, STATE OF OHIO
My commission expires 5-9-1994
Recorded in Lake County

RESPONSE TO NRC BULLETIN 92-01

On June 30, 1992, Perry Nuclear Power Plant (PNPP) received NRC Bulletin 92-01 regarding test failures associated with Thermo-Lag 330 fire barrier systems. The subject NRC Bulletin requested licensees to take the following actions:

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.
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.
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.

With regard to the fire barrier applications described in Action Item 1 above, it has been determined that the majority of the protected cable trays and conduit utilized at Perry fall within the scope of the Bulletin. Areas utilizing Thermo-Lag fire barrier systems had previously been considered impaired due to installation deficiencies. These installation deficiencies included exceeding the maximum spacing interval for banding and inadequate barrier material thickness.

Perry Technical Specification 6.9.4 requires that violations of the Fire Protection Program which would adversely affect the ability to achieve and maintain safe shutdown in the event of a fire be reported to the NRC via the Licensee Event Report (LER) system. Pursuant to this Technical Specification requirement, the above referenced installation deficiencies were reported to the NRC under LERs 91-020 and 91-020-01 dated December 5, 1991 and January 3, 1992 respectively.

Additionally, Action Item 2 from NRC Bulletin 92-01 was previously addressed as part of the corrective action for the referenced LERs. As stated in LER 91-020-01, insufficient barrier thickness was determined to be a generic plant-wide problem. On December 4, 1991 all protected Appendix R conduits and cable raceways were declared impaired and compensatory measures initiated. These compensatory measures involved the establishment of hourly fire watches and operable fire detectors in all affected areas. The compensatory measures will remain in effect until all affected raceways and conduits are restored to operable condition. Currently, corrective actions to restore the associated

cable runways and conduit to operable status have been suspended pending resolution of all outstanding issues regarding Thermo-Lag fire barrier system deficiencies. Appropriate actions to restore fire barrier operability are being developed through an industry program being coordinated by NUMARC. The NUMARC activities will be evaluated for incorporation into the Perry site specific resolution. PNPP will apply the results of this effort, when completed, to the Thermo-Lag installations within the scope of NRC Bulletin 92-01.

The above response satisfies the notification requirements addressed in Action Item 3 of the subject NRC Bulletin.

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