

Detroit
Edison

William S. Orner
Senior Vice President

Fermi 2
6400 North Dixie Highway
Newport, Michigan 48106
(313) 586-1201



Nuclear
Operations

July 23, 1992
NRC-92-0091

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

- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) 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.

Subject: Detroit Edison Response to NRC Bulletin 92-01

The purpose of this letter is to provide Detroit Edison's response to Bulletin 92-01 (Reference 2) which was received on June 25, 1992. This bulletin provided notification of failures in fire endurance testing of the Thermo-Lag 330 Fire Barrier System; requested licensees to take the recommended action; and required a written response describing the actions taken in response to this bulletin.

Accordingly, pursuant to the oath and affirmation requirements of 10CFR50.54(f), Detroit Edison has reviewed Bulletin 92-01 and provides the information required under the "Requested Actions" of the bulletin. As requested, a copy is also being submitted to the Regional Administrator, U.S. NRC Region III.

Upon receipt of Bulletin 92-01, Detroit Edison took immediate actions to identify the areas of the plant which have Thermo-Lag 330 material and to implement the appropriate compensatory measures.

Detroit Edison's review identified eleven (11) areas in the plant where Thermo-Lag material is installed. However, only two (2) areas use this material to protect cable trays wider than 14 inches and small diameter conduit that provide safe shutdown capability. These two areas are the control room ventilation equipment room (Fire Zone AB14) and the stairwell in the northeast corner of the Auxiliary Building between elevation 613' 6" and 630' 6" (Fire Zone AB3). Both of these areas have an automatic fire detection system.

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A roving hourly fire watch patrol was established for these two areas as a compensatory measure until a permanent resolution is achieved. In the remaining nine areas, the Thermo-Lag 330 material is used in wall and ceiling fire barriers which are not in the scope of this bulletin. Nevertheless, Detroit Edison will perform an evaluation of these fire barriers as a separate issue.

In addition to the continuing fire watches, Detroit Edison is preparing an engineering evaluation of the Thermo-Lag fire barrier material to assess whether this material is capable of performing its intended function at Fermi 2 and to ensure that it does not present any undue risk to the plant or adversely affect the plant's ability to achieve and maintain safe shutdown. This evaluation will be based on the guidelines of NRC Generic Letter 86-10 on fire protection and is expected to be completed by August 31, 1992.

Detroit Edison is in contact with the vendor (Thermal Science, Inc.) who is performing additional tests on Thermo-Lag 330 material. Upon receipt of the test results, Detroit Edison will review the results for their applicability and impact on Fermi 2.

Appropriate actions to restore fire barrier integrity 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. Detroit Edison will apply the results of these efforts, when completed, to the Thermo-Lag installations within the scope of Bulletin 92-01.

If you have any questions, please contact Mr. Girija S. Shukla at (313) 586-4270.

Sincerely,



cc: T. G. Colburn
A. B. Davis
A. Marion (NUMARC)
M. P. Phillips
S. Stasek

I, WILLIAM S. ORSER, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

William S. Orser
WILLIAM S. ORSER
Senior Vice President

On this 23rd day of July, 1992, before me personally appeared William S. Orser, being first duly sworn and says that he executed the foregoing as his free act and deed.

Rosalie A. Arnetta
Notary Public

ROSALIE A. ARNETTA
NOTARY PUBLIC, STATE OF MICHIGAN
MONIE COUNTY
MY COMMISSION EXPIRES NOV. 20, 1993