

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000

July 24, 1992

Docket Nos. 50-277  
50-278  
50-352  
50-353

License Nos. DPR-44  
DPR-56  
NPF-39  
NPF-85

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

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3  
Limerick Generating Station, Units 1 and 2  
Response to 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"

Gentlemen:

NRC Bulletin (NRCB) 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," was issued on June 24, 1992 to notify licensees of failures in fire endurance testing associated with the Thermo-Lag 330 fire barrier systems installed to protect safe shutdown capability. Because of failures experienced during recent fire endurance testing of Thermo-Lag 330 fire barrier systems conducted by Texas Utilities (TU) Electric, the NRC determined that the one (1) and three (3) hour pre-formed assemblies installed on small conduit and wide cable trays (wider than 14 inches) do not provide the level of safety as required by NRC requirements. Accordingly, NRCB No. 92-01 requested licensees to take the immediate actions identified below.

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.

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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.

Philadelphia Electric Company's (PECo's) response to NRCB No. 92-01 is provided below.

#### Response

PECo does have Thermo-Lag 330 fire barrier systems installed at Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, and Limerick Generating Station (LGS), Units 1 and 2. Those areas of PBAPS and LGS which have Thermo-Lag 330 fire barrier material installed on conduit four (4) inches or smaller and cable trays wider than 14 inches to protect safe shutdown capability have been identified, and the associated fire barriers have been declared inoperable. Additionally, the appropriate compensatory measures (i.e., fire watches) have been established in accordance with PBAPS and LGS Technical Specifications (TS) in those areas or NRC approval has been obtained for the use of an equivalent method of complying with TS fire watch requirements. Specifically, by letter dated July 2, 1992, we received NRC approval for the use of closed circuit television (CCTV) to perform the TS required fire watch for the Neutron Monitoring System area for LGS Unit 1. Similarly, by letter dated July 17, 1992, we received NRC approval of our request for a Temporary Waiver of Compliance from the TS required continuous fire watch for the Pipe Tunnel area for PBAPS Unit 2 until we could install the temporary fire detection equipment and CCTV system, also approved by the NRC in the July 17, 1992 letter, to perform a TS required hourly fire watch for the Pipe Tunnel area.

These compensatory measures will remain in effect until the appropriate actions have been taken to restore fire barrier operability. Such actions are being developed through an industry program being coordinated by the Nuclear Management and Resources Council (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. We intend to apply the appropriate results of these efforts, when completed, to the Thermo-Lag installations within the scope of NRCB No. 92-01.

Accordingly, we will provide the NRC with a supplemental response describing the actions taken to restore fire barrier operability once implemented.

If you have any questions, please do not hesitate to contact us.

Very truly yours,



G. J. Beck, Manager  
Licensing Section  
Nuclear Services Department

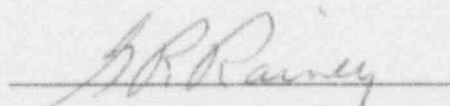
Enclosure: Affirmation

cc: T. T. Martin, Administrator, Region I, USNRC  
J. J. Lyash, USNRC Senior Resident Inspector, PBAPS  
T. J. Kenny, USNRC Senior Resident Inspector, LGS

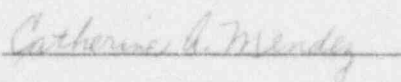
COMMONWEALTH OF PENNSYLVANIA :  
: SS.  
COUNTY OF CHESTER :

G. R. Rainey, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company;  
that he has read the foregoing response to 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," for Peach Bottom Atomic Power Station, Units 2 and 3, and Limerick Generating Station, Units 1 and 2, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

  
Vice President

Subscribed and sworn to  
before me this 24<sup>th</sup> day  
of JULY, 1992.



Notary Public

