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HL-2322
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July 20, 1992

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

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
RESPONSE TO NRC BULLETIN NO. 92-01

Gentlemen:

On June 24, 1992, the NRC issued 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." 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 in response to NRC Bulletin No. 92-01 and the measures being taken to ensure or restore fire barrier operability.

Mr. J. T. Beckham, Jr. states he is duly authorized to execute this oath on behalf of Georgia Power Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By: J. T. Beckham, Jr.
J. T. Beckham, Jr.

Sworn to and subscribed before me this 20th day of July 1992.

Elaine E. Bolton

Notary Public

My Commission Expires Aug. 8, 1995

MCM/

Enclosure

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U.S. Nuclear Regulatory Commission
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cc: Georgia Power Company
Mr. H. L. Sumner, General Manager - Nuclear Plant
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebnetter, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

ENCLOSURE

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
RESPONSE TO NRC BULLETIN NO. 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 June 25, 1992, GPC received a facsimile copy of NRC Bulletin No. 92-01 which was delivered by the Resident Inspector to the General Manager of Plant Hatch. Hatch personnel immediately initiated actions in response to the 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 or wide cable trays which provide safe shutdown capability. The following areas were identified as meeting the criteria of the bulletin:

<u>Fire Zone</u>	<u>Description of Area</u>
0001	Unit 1 Control Building 112' El. Working Floor
0007B	Unit 1 Control Building 112' El. Water Analysis Room
0014G	Unit 1 Control Building 110' El. HP Supervisor's Office
0014K	Unit 1 Control Building 130' El. Working Floor
0024A	Unit 1/2 Control Building 147' El. Cable Spread Room
0040	Unit 1/2 Control Building 130' El. Vertical Cable Chase
1017	Unit 1 Control Building 130' El. East 600V Swgr. Room
1020	Unit 1 Control Building 130' El. East DC Swgr. Room
1104	Unit 1 Turbine Building 130' El. East Cableway
1203A	Unit 1 Reactor Building Below 130' El. South Torus Room
1203B	Unit 1 Reactor Building Below 130' El. SE Corner Room
1203F	Unit 1 Reactor Building 130' El. South Working Floor
1205A	Unit 1 Reactor Building Below 130' El. North Torus Room
1205F	Unit 1 Reactor Building 130' El. North Working Floor
1412	Unit 1 Diesel Generator Building 130' El. Swgr. Room 1E
2014	Unit 2 Control Building 130' El. Swgr. Access Hallway
2104	Unit 2 Turbine Building 130' El. East Cableway
2203A	Unit 2 Reactor Building Below 130' El. North Torus Room
2203F	Unit 2 Reactor Building 130' El. North Working Floor
2205A	Unit 2 Reactor Building Below 130' El. South Torus Room
2205F	Unit 2 Reactor Building 130' El. South Working Floor
2205N	Unit 2 Reactor Building 150' El. Chiller Room

ENCLOSURE (Continued)

RESPONSE TO NRC BULLETIN NO. 92-01

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."

GPC Response to Item 2:

The Plant Hatch fire protection program requirements are contained in the "Edwin I. Hatch Nuclear Plant Units 1 and 2 Fire Hazards Analysis and Fire Protection Program" (FHA). Appendix B of the FHA addresses fire protection operability and surveillance requirements. Appendix B of the FHA requires all fire-rated assemblies necessary for safe shutdown to be operable at all times. The Action statement for inoperability of these assemblies is as follows:

- a. With one or more of the above required fire-rated assemblies and/or sealing devices inoperable or with the required surveillance interval (including grace period) exceeded, within 1 hour establish a continuous fire watch on at least one side of the affected assembly(s) and/or sealing device(s) or verify the OPERABILITY of fire detectors on at least one side of the inoperable assembly(s) and sealing devices(s) and establish an hourly fire patrol.
- b. Restore the inoperable fire-rated assembly(s) and/or sealing devices to OPERABLE status within 14 days or prepare and submit a special report to the Commission within the next 30 days per Technical Specification 6.9.2."

In this case the subject fire-rated assemblies are the Thermo-Lag 330 fire barriers and, since these assemblies are installed in various fire zones, the required fire watches must be performed in the fire zones in which the fire barriers are installed.

All of the affected fire zones have installed, operable fire detection systems except one. The one zone which does not have an installed fire detection system is zone 0007B, the Unit 1 Water Analysis Room. However, the FHA states the design basis fire for this zone is expected to develop slowly and be rapidly detected by the detection system for adjacent zone 0007A which includes the hallway outside the door to the Water Analysis Room. By maintaining the non-fire rated door between zones 0007A and 0007B open, credit can be taken for the zone 0007A fire detection system to detect a fire in zone 0007B. Since all

ENCLOSURE (Continued)

RESPONSE TO NRC BULLETIN NO. 92-01

affected fire zones have operable fire detectors, only an hourly fire watch patrol is required rather than a continuous fire watch. This information was relayed to site personnel, and the first fire watch patrol was performed on the afternoon of June 29, 1992.

On each unit, one area, referred to as the Drywell Access Room, contains fire barriers which meet the criteria of the bulletin and is administratively controlled as a high radiation area. Dose rates in these rooms are in the range of 5 to 120 mr/hr gamma and 0 to 25 mr/hr neutron, depending on location in the room. Therefore, control of these rooms as high radiation areas precludes inadvertent overexposure of personnel. Also, the normal ambient temperature in these rooms is approximately 130°F. For these reasons alternative methods of complying with the fire watch requirements were implemented. The Unit 1 Drywell Access Room has a grating roof and an acceptable fire watch can be performed by climbing a ladder and looking down into the room without entering a high radiation field. This operation was added to the fire watch patrol on July 1, 1992. The Unit 2 Drywell Access Room does not have a grating roof; therefore, in order to perform the required fire watch a temporary camera was installed. The fire watch for this room is performed by viewing a television picture of the room once per hour. This operation was also added to the fire watch patrol on July 1, 1992. The above actions fulfill the requirement for compensatory measures set forth in NRC Bulletin No. 92-01.

In addition to fire watches, the FHA requires a special report to the NRC if the subject fire barriers are not restored to operability within 14 days. The fire barriers which meet the criteria of the bulletin have been considered inoperable for greater than 14 days, so a special report would be required. However, this letter discusses the subject fire barriers, the compensatory actions taken, and the planned actions for restoration of fire barrier operability and, therefore, fulfills the requirements of the special report. No additional report will be submitted.

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."

ENCLOSURE (Continued)

RESPONSE TO NRC BULLETIN NO. 92-01

GPC Response to Item 3:

At this point in time, no specific long term resolution of the Thermo-Lag fire barrier deficiencies has been defined. The industry is currently working together through NUMARC in an attempt to determine the actions necessary to resolve this issue. Fire watches will remain in place until required actions are identified and implemented on the subject fire barriers.