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September 23, 1992 RBG- 37, 509 File Nos. G9.5, G9.33.1

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

Gentlemen:

River Bend Station - Unit 1 Docket No. 50-458 NRC Bulletin 92-01, Supplement 1

This letter provides Gulf States Utilities Company's (GSU) response to NRC Bulletin 92-01, Supplement 1 "Failure of Thermo-Lag 330 Fire Barrier System to Perform Its Specified Fire Endurance Function."

GSU uses both 1-hour and 3-hour pre-formed Thermo-Lag 330 panels and conduit shapes in 14 fire areas at River Bend Station (RBS). The panels are used on cable trays ranging in width from 18 inches to 30 inches and the protected conduits range in size from 3/4 inch to 4 inches in diameter. Another application of Thermo-Lag at RBS is for protective enclosures around an instrument rack and around three motor-operated valves. A list of Thermo-Lag wrapped raceways is included in surveillance test procedure (STP) 000-3602, "Fire Barrier Assembly Visual Inspection". A summary of the various rated Thermo-Lag barriers follows:

1-Hour Rated Conduit	3500 linear feet
1-Hour Rated Cable Tray	900 linear feet
3-Hour Rated Conduit	1000 linear feet
3-Hour Rated Cable Tray	350 linear feet
Equipment Enclosures	210 square feet
Ceiling	200 square feet

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Details of the location, size of raceway and fire rating of all Thermo-Lag used to protect components required to achieve safe shutdown are listed in the attached table.

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The structural supports required to secure the listed raceways and enclosures are also wrapped with Thermo-Lag 330. The fire rating of the Thermo-Lag surrounding the structural supports is equivalent to the fire rating of the component being protected. This quantity of Thermo-Lag has not been estimated.

All Thermo-Lag fire barriers at RBS were declared inoperable on October 26, 1989, following an unsuccessful fire endurance test performed by GSU at Southwest Research Institute. Hourly firewatch patrols were immediately established in compliance with the compensatory action required by Technical Specification 3/4.7.7. These fire watch patrols have been in continuous operation since October, 1989.

Upgrades to the existing Thermo-Lag barriers at RBS were tested; however, new concerns raised by the NRC regarding ampacity derating, combustibility and qualification of initial fire resistance testing of Thermo-Lag have prevented implementation of these upgrades. Currently, GSU is participating in a NUMARC ad hoc committee on Thermo-Lag. NUMARC is coordinating an industry program to develop appropriate actions to restore fire barrier operability. 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. The results of these efforts, when completed will be applied to the Thermo-Lag installations within the scope of Bulletin 92-01, Supplement 1.

If you have any questions or require additional information, please contact Mr. L.L. Dietrich of my staff at (504) 381-4866.

Sincerely,

W.H. Odell

Manager - Oversight

River Bend Nuclear Group

LAE/LLD/JEM/JRH/TMH/kvm

CC: U.S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011

> NRC Resident Inspector P.O. Box 1051 St. Francisville, LA 70775

ATTACHMENT

BUILDING	ELEVATION	RACEWAY & SIZE	FIRE RATING
AUXILIARY 70'	70'	CONDUIT 1 %"	3 HOUR
		MOTOR OPERATED VALVE ENCLOSURE QTY: 1 APPROX SIZE 3'-0" X 3'-0" X 4'-0"	3-HOUR
	CONDUIT 1 %" & 3" JUNCTION BOXES QTY, 3 CABLE TRAY 18" WIDE	1-HOUR 1-HOUR 1-HOUR	
CONTROL 70'	70'	CONDUIT 1 %", 3" & 4" JUNCTION BOXES QTY, 1 CABLE TRAY 18" WIDE	1-HOUR 1-HOUR 1-HOUR
	98'	CONDUIT 2" & 4" CABLE TRAY 18" & 30" WIDE INSTRUMENT RACK ENCLOSURE APPROX SIZE 6'-0" X 6'-0" X 2'-0"	3-HOUR 3-HOUR 3-HOUR
The Control of the Control	116	CONDUIT %", 1 %", 3", & 4" CONDUIT %", 1 %", 3", & 4" CABLE TRAY 18" WIDE	3-HOUR 1-HOUR 1-HOUR
UNNELS	70'	CONDUIT 1%", 2", 3" & 4" JUNCTION BOXES QTY, 9 MULTIPLE CABLE TRAY ENCLOSURE APPROX. SIZE 8'-0" TO 12'-0" HIGH X 6'-0" WIDE	1-HOUR 1-HOUR 1-HOUR
	NOTE: 8'-0" HIGH ENCLOSURE 3-SIDED (BOTTOM, SIDE & TOP) 12'-0" HIGH ENCLOSURE 2-SIDED (BOTTOM & SIDE TO CEILING)		
		MOTOR-OPERATED VALVE ENGLOSURE QTY, 2 APPROX. SIZE 3'-0" X 3'-0" X 4'-0"	1-HOUR
FUEL	70'	CONDUIT 4" CABLE TRAY 18" WIDE	3-HOUR 3-HOUR
	9.5	CABLE TRAY 18" WIDE	3-HOUR
	113	CABLE TRAY 18" WIDE	3-HOUR
	148	CONDUIT 1" & 1 1/2" CABLE TRAY 18" WIDE	3-HOUR