



ENTERGY

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W. T. Cottle
Vice President
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Thermal and Nuclear Division

September 25, 1992

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Response to NRC Bulletin 92-01, Supplement 1

GNRO-92/00122

Gentlemen:

This submittal provides the Grand Gulf Nuclear Station (GGNS) response to NRC Bulletin (NRCB) 92-01 Supplement 1, "Failure of Thermo-Lag 330 Fire Barrier System to Perform its Specified Fire Endurance Function". Supplement 1 to NRCB 92-01 notified licensees of apparent failures in fire endurance testing beyond the scope of the initial bulletin. The supplement requests licensees to identify plant areas that have Thermo-Lag 330 installed for the protection and separation of safe shutdown capability, to take recommended compensatory measures, and requires submittal of a written response within 30 days of receiving the supplement describing actions taken to address this issue.

The GGNS response to the initial NRCB 92-01 was submitted by letter dated July 24, 1992. NRC acceptance of the GGNS response was received in a letter dated September 2, 1992. The uses of Thermo-Lag 330 at GGNS were reviewed based on the expanded scope of Supplement 1. Results from this review concluded that our response to the initial bulletin and the compensatory measures established, which remain in effect, encompasses the expanded scope of NRCB 92-01 Supplement 1. Further discussion of these actions is provided in Attachment 1.

As requested in NRCB 92-01 Supplement 1, this information is being submitted under oath and affirmation in accordance with 10CFR50.54(f) (Attachment 2). Please contact this office should you have any questions, or require additional information regarding this matter.

Yours truly,

W T Cottle

WTC/CEB/mtc

attachments: 1) GGNS Response to NRCB 92-01, Supplement 1
2) Oath and Affirmation per 10CFR 50.54(f)

cc: (See Next Page)

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Attachment 1

GGNS Response to NRC Bulletin 92-01

Supplement 1

Grand Gulf Nuclear Station
Response to NRC Bulletin 92-01, Supplement 1

Reporting requirements applicable to holders of
operating licenses for nuclear power reactors

- NRCB Item No. 1:** For those plants that use either 1- or 3- hour preformed 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 the protection and separation of the safe shutdown capability.
- GGNS Response:** GGNS uses both 1 hour and 3 hour preformed Thermo-Lag 330 fire barrier material for protecting equipment required to achieve and maintain safe shutdown in the event of a fire. Table 1 lists the specific plant areas identified where Thermo-Lag is utilized to protect safe shutdown components. This list is the same as that previously identified in our response to the initial bulletin.
- NRCB Item No. 2:** In those plant areas in which Thermo-Lag fire barriers are used in raceways, walls, ceilings, equipment enclosures, or other areas to protect cable trays, conduits, or separate redundant safe shutdown functions, 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. These compensatory measures should remain in place until the licensee can declare the fire barriers operable on the basis of applicable tests which demonstrate successful 1- or 3-hour barrier performance.
- GGNS Response:** As stipulated by the initial bulletin, GGNS established compensatory measures consistent with the actions normally taken for inoperable fire barriers. In addition, non-circuit/raceway applications outside the scope of the initial bulletin were also addressed. As a result, the plant areas required to be monitored based on the expanded scope of Supplement 1 are encompassed by our existing compensatory measures. These measures consist of roving hourly fire watches as directed by the GGNS fire protection program.
- As stated in our response to the initial bulletin, GGNS will participate in the industry wide program being coordinated by NUMARC for assessing fire barrier concerns. The results of this program, when completed, will be applied to the Thermo-Lag 330 fire barrier installations at GGNS.

Areas using Thermo-Lag 330 to protect safe shutdown raceways

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OC#	Description
OC202	Unit 1 Division I Switchgear Area
OC214	Unit 2 Division I Switchgear Area
OC302	Unit 1 Control Room
OC308	Unit 1 Lower Cable Building Area
OC402	Unit 1 Upper Cable Spreading Corridor
OC702	Motor Control Cable Spreading Room
IA316	Cable Control Center
IA539	Cable Space
OC214	Non-Circuit/Raceway Applications of Thermo-Lag 330 enhancement of fire barrier which separates Fire Zones OC217 and OC303).
OC303	Unit 2 Division I Switchgear Area (Thermo-Lag 330 enhancement of fire barrier which separates Fire Zones OC217 and OC303).

Grand Gulf Nuclear Station
 Response to NRC Bulletin 92-01, Supplement 1

Table 1

Areas Using Thermo-Lag 330 to protect safe shutdown raceways

Fire Zone	Description
OC202	Unit 1 Division 1 Switchgear Area
OC214	Unit 2 Division 1 Switchgear Area
OC302	HVAC Equip Room
OC308	Unit 1 Control Building Corridor
OC402	Unit 1 Lower Cable Spreading Room
OC702	Unit 1 Upper Cable Spreading Room
1A316	Motor Control Center
1A539	Cable Space

Non-Circuit/Raceway Applications of Thermo-Lag 330

OC214	Unit 2 Division 1 Switchgear Area (Thermo-Lag 330 enhancement of fire barrier which separates Fire Zones OC217 and OC214).
OC303	HVAC Equipment Room (Thermo-Lag 330 enhancement of fire barrier which separates Fire Zones OC217 and OC303).

Attachment 2

Oath and Affirmation for Response to NRC Bulletin 92-01

Supplement 1

AFFIDAVIT

STATE OF MISSISSIPPI
COUNTY OF CLAIBORNE

W. T. Cottle, being duly sworn, states that he is Vice President, Operations GGNS of Entergy Operations, Inc.; that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission this response to NRC Bulletin No. 92-01, Supplement 1 on behalf of the Company and South Mississippi Electric Power Association; that he signed the foregoing letter as Vice President, Operations GGNS of Entergy Operations, Inc.; and that the statements made and the matters set forth therein are true and correct to the best of his knowledge, information and belief.

W. T. Cottle
W. T. Cottle

SUBSCRIBED AND SWORN TO before me, a Notary Public, in and for the County and State above named, this 25th day of September, 1992.

(SEAL)

Elizabeth L. Laug
Notary Public

My commission expires:

December 28, 1995