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U-602047
L30-92(09-29)-LP
8G.130

JSP-483-92
September 29, 1992

Docket No. 50-461

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

Subject: Clinton Power Station's Response to Bulletin 92-01, Supplement 1, "Failure of Thermo-Lag 330 Fire Barrier System to Perform Its Specified Fire Endurance Function"

Dear Sir:

On September 1, 1992, Illinois Power (IP) received Bulletin 92-01, Supplement 1. Within the Bulletin, the Nuclear Regulatory Commission (NRC) notified IP of additional apparent failures in fire endurance testing associated with Thermo-Lag 330 fire barrier systems. The NRC requested IP to identify all areas at Clinton Power Station (CPS) that have Thermo-Lag 330 fire barrier material installed and to determine the areas of the plant which use this material for the protection and separation of the plant's safe shutdown capability. The NRC also requested IP to implement, in accordance with plant procedures, appropriate compensatory measures in areas where Thermo-Lag 330 fire barrier systems are used in raceways, walls, ceilings, equipment enclosures, or other areas to protect cable trays, conduits, or separate redundant safe shutdown functions.

Attachment 1 to this letter provides identification of all areas at CPS where Thermo-Lag 330 fire barrier systems are installed. Nine of these installations were discussed in IP's response (IP letter U-602013, dated July 24, 1992) to Bulletin 92-01, "Failure of Thermo-Lag 330 Fire Barrier Systems to Maintain Cabling in Wide Cable Trays and Small Conduits Free From Fire Damage". A discussion concerning the compensatory measures put in place at CPS and the measures being taken to restore operability of the two installations not discussed in IP's response to Bulletin 92-01 is also provided as requested.

Hourly firewatch patrols have been established in the areas where Thermo-Lag 330 fire barrier material is used to protect safe shutdown capability or to separate redundant safe shutdown functions. The hourly firewatch patrols will continue until safe shutdown capability is ensured without reliance on the hourly firewatch patrols. These compensatory measures are consistent with the requirements of CPS procedure 1893.01, FIRE PROTECTION IMPAIRMENT REPORTING, and the CPS Technical Specifications.

To ensure that IP implements the appropriate actions required to restore fire barrier operability at CPS, IP is participating in the industry fire barrier operability restoration effort which is being coordinated by the Nuclear

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Management and Resources Council (NUMARC). This effort includes establishment of fire barrier testing acceptance criteria, configuration assessment guidelines, generic installation guidance, and coordination of generic Thermo-Lag 330 fire barrier system testing.

IP is also investigating other possible actions which will allow CPS to be in compliance with 10CFR50, Appendix R, without reliance on hourly firewatch patrols. Options being investigated include, but are not limited to: replacement of Thermo-Lag 330 fire barrier systems installed at CPS with another product, routing of fire-resistant cables, or installation of automatic suppression systems.

The information that will be obtained as a result of the industry fire barrier operability restoration effort is necessary prior to IP making a final decision on the actions to be taken to restore the fire barrier systems to an operable status. IP will inform the NRC when all corrective actions have been completed.

At this time, IP is unable to provide an accurate account of the time and costs of complying with this Bulletin.

I hereby affirm that the information in this letter is correct to the best of my knowledge.

Sincerely yours,

J. S. Perry
Senior Vice President

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WS122:WTD19

Attachment

cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety
Nuclear Management and Resources Council
Attention: Biff Bradley

Attachment 1

CPS Thermo-Lag 330 Installations Discussed in the IP Response to Bulletin 92-01

	Location	Firewrapped Items
1.	707'6" Auxiliary Building (fire zone A-1g)	210' of 36"-wide cable tray 22' of 24"-wide cable tray
2.	803'3" Containment Building (fire zone C-2)	69' of 24"-wide cable tray
3.	751'0" Control Building (fire zone CB-1e)	90' of 36"-wide cable tray 147' of 24"-wide cable tray
4.	762'0" Control Building (fire zone CB-1f)	54' of 36"-wide cable tray
5.	762'0" Control Building (fire zone CB-1f)	50' of 36"-wide cable tray 45' of 24"-wide cable tray
6.	781'0" Control Building (fire zone CB-1g)	13' of 1.5"-diameter conduit
7.	781'0" Control Building (fire zone CB-4)	18' of 3"-diameter conduit 18' of 2.5"-diameter conduit
8.	781'0" Control Building (fire zone CB-5a)	73' of 2"-diameter conduit
9.	800'0" Control Building (fire zone CB-6d)	23' of 4"-diameter conduit 23' of 2"-diameter conduit 23' of 0.75"-diameter conduit

CPS Thermo-Lag 330 Installations Impacted by Bulletin 92-01, Supplement 1

	Location	Firewrapped Items
10.	762'0" Diesel Generator Building (fire zone D-8)	76' of 5"-diameter conduit
11.	781'0" Fuel Building (east) (fire zone F-1p)	18"-diameter penetration seal facing