



Northern States Power Company

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10 CFR Part 50,
Section 50.54(f)

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

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Response to NRC Bulletin 92-01 Supplement 1, "Failure
of Thermo-Lag 330 Fire Barrier System to
Perform Its Specified Fire Endurance Function"

Attachment 1 to this letter provides our response to NRC Bulletin 92-01 Supplement 1, "Failure of Thermo-Lag 330 Fire Barrier System to Perform Its Specified Fire Endurance Function". Attachment 1 also provides the information necessary to satisfy Technical Specification 3.13.G.2, which requires that a special report be submitted to the Commission when an inoperable penetration fire barrier cannot be restored to operable status within 14 days.

Please contact us if you require additional information.

Thomas M. Parker
Manager
Nuclear Support Services

cc: Regional Administrator-II., NRC
NRR Project Manager, NRC
Resident Inspector, NRC
State of Minnesota,
Attn: Kris Sanda
Silberg

Attachments: Affidavit to the US Nuclear Regulatory Commission

Attachment 1: Response to NRC Bulletin 92-01 Supplement 1

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UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

DOCKET NO. 50-263

Response to NRC Bulletin 92-01 Supplement 1, "Failure
of Thermo-Lag 330 Fire Barrier System to
Perform Its Specified Fire Endurance Function"

Northern States Power Company, a Minnesota corporation, hereby provides the information requested by NRC Bulletin 92-01 Supplement 1, "Failure of Thermo-Lag 330 Fire Barrier System to Perform Its Specified Fire Endurance Function". Pursuant to 10 CFR 50.54(f), answers to the specific questions asked by the bulletin are provided in attachment 1 to this submittal.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

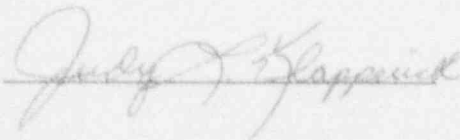
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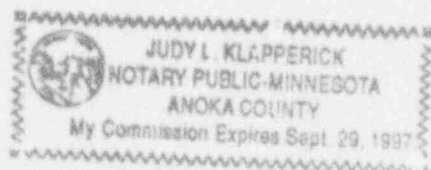

Thomas M Parker

Manager

Nuclear Support Services

On this 28th day of September 1992 before me a notary public in and for said County, personally appeared Thomas M Parker, Manager Nuclear Support Services, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Northern States Power Company, that he knows the contents thereof, and that to the best of his knowledge, information, and belief the statements made in it are true and that it is not interposed for delay.





Attachment 1

RESPONSE TO NRC BULLETIN 92-01 SUPPLEMENT 1

BACKGROUND:

On June 24, 1992, an advance copy of NRC Bulletin 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 received at Monticello.

Based on an evaluation of the information contained in this bulletin, one fire barrier was declared inoperable on June 24, 1992 and compensatory measures were established.

On August 31, 1992, an advance copy of NRC Bulletin 92-01 Supplement 1 "Failure of Thermo-Lag 330 Fire Barrier System to Perform Its Specified Fire Endurance Function" was received. This supplement required that each licensee submit a written response to questions concerning usage of Thermo-Lag at each facility.

Based on an evaluation of the information contained in this bulletin supplement, one additional fire barrier was declared inoperable on August 31, 1992 and compensatory measures were established.

Technical Specification 3.15.G.2 requires, in part, that if an inoperable penetration fire barrier cannot be restored to operable status within 14 days, a special report must be submitted to the Commission outlining the cause of the inoperability and the plans and schedule for restoring the barrier to operable status. The barriers declared inoperable on June 24, 1992 and August 31, 1992 remain inoperable at this time, therefore, the Technical Specification requirement for a special report applies.

BULLETIN RESPONSE:

With respect to NRC Bulletin No. 92-01 Supplement 1, we provide the following information:

Bulletin 92-01 Supplement 1 Requested Actions:

"Each licensee who has installed Thermo-Lag 330 fire barriers must inform the NRC in writing within 30 days of receiving this bulletin supplement, whether or not it has taken the (following) actions.":

- "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 the protection and separation of the safe shutdown capability."

Response: As reported in our July 24, 1992 response to Bulletin 92-01, Monticello presently uses Thermo-Lag 330 Fire Barrier Systems in one fire area. There is approximately 35 feet of barrier on one inch conduit and 35 feet of barrier on four inch conduit. Both of these barriers are used to ensure safe shutdown capability during a 10 CFR Part 50, Appendix R fire.

- "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 that 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."

Re: use: The barrier protecting the one inch conduit was declared inoperable per Bulletin 92-01. A continuous fire watch was posted until a fire detection system with remote alarm was installed, at which time a once per hour roving fire watch covering the affected area was implemented per the Plant Technical Specification for Penetration Fire Barriers (Technical Specification 3.14.G 2).

Per Bulletin 92-01 Supplement 1, the barrier protecting the four inch conduit was declared inoperable on August 31, 1992. Since the one inch and four inch barriers are located within one foot of each other for their entire length, the previously installed fire detection and alarm system continued to provide adequate coverage. The once per hour roving fire watch established for the one inch barrier was expanded to include the four inch barrier.

If the detection system in this area becomes inoperable, a continuous fire watch will be reestablished per the Technical Specifications.

"Where fire barriers are declared inoperable, the licensee is required to describe the measures being taken to ensure or restore fire barrier operability. These measures should be consistent with actions taken in response to Bulletin 92-01."

Response: Our plan to restore the one and four inch conduit fire barriers to operable status is composed of two parallel efforts. First, a Design Change has been initiated to replace the inoperable fire barriers or reroute the affected conduits so that they do not require fire barrier wraps. Second, actions to restore fire barrier operability are being developed through an industry program being coordinated through NUMARC. This program will include establishment of a test database, development of guidance for applicability of tests, development of generic installation guidance, and consideration of additional testing as appropriate. We will apply the results of one of these efforts, as appropriate, to the inoperable conduit fire barriers. These measures are consistent with actions taken in response to Bulletin 92 J1.

ADDITIONAL INFORMATION TO SATISFY TECHNICAL SPECIFICATION REPORTING REQUIREMENTS:

With respect to the report required by Technical Specification 3.14.G.2, the following additional information is provided:

Cause of Inoperability: The fire barriers were declared inoperable as a result of the information provided in NRC Bulletin No. 92-01 and Supplement 1 concerning the failure of Thermo-Lag 330 fire barrier systems during endurance testing.

Plans and Schedule for Restoring Barrier to Operable Status: Our plans for restoring the inoperable fire barriers are discussed in the bulletin response above. The barriers will be restored to operability by the end of our 1993 refueling outage. Note that in our letter of July 24, 1992 on this subject, we indicated this action would be complete by March 31, 1993. That date was selected because it represented the projected completion date for the 1993 refueling outage, which is when the work will be performed. Since that time, the outage start date has been moved back approximately 3 weeks. We have therefore revised the commitment completion date to reflect the fact it is dependent on the outage schedule.