Iowa Electric sught and Power Company

NG-92-4408

JOHN F. FRANZ, JR

Dr. Thomas E. Murley, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Attn: Document Control Desk Mail Station P1-137 Washington, DC 20555

> Subject: Duane Arnold Energy Center Op. License No: DPR-49 Response to NRC Bulletin No. 92-01, Supplement 1 1) NRC Bulletin No. 92-01, Supplement

Reference:

1: Failure of Thermo-Lag 330 Fire Barrier System to Perform Its Specified Fire Endurance Function, (Aug. 28, 1992)

Letter from J. Franz (Iowa Electric) to T. Murley (NRC', "Response to NRC Bulletin No. 92-01", NG-92-3184, (July 23, 1992) Fils: A-101a, P-72a

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Deai Dr. Murley:

This letter provides Iowa Electric Light and Power Company's (IELP's) response to Supplement 1 to NRC Bulletin No. 92-01 (R. ference 1). This supplement expands the scope of the original Bulletin to include all applications of pre-formed Thermo-Lag 330 panels and conduit shapes used for protection and separation of safe shutdown equipment.

Reference 1 requested that licensees take two actions and submit a report to the NRC Staff. These requests and our responses are

# Requested Action

For those plants that use either 1- or 3-hour pre-formed 1.1 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.

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General Office \* P.O. Box 351 \* Cedar Rapids, Iowa 52406 \* 319/398-4411

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IELP Response

As stated in Reference 2, the DAEC staff has identified all areas of our plant where Thermo-Lag 330 fire barrier material is installed and has determined the areas which use this material for the protection and separation of safe shutdown capability.

### Requested Action

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 ustil the licensee can declare the fire barriers operable on the basis of applicable tests which demonstrate successful 1- or 3-hour barrier performance.

### IELF Response

The DAEC staff has identified all areas specified in the above requested action. We have also identified areas where pre-formed Thermo-Lag panels are used for structural steel fire-proofing. Since these applications are used to protect safe shutdown capability, we have considered them to be within the scope of Reference 1.

The DAEC Technical Specifications (TS) require the following compensatory measures for inoperable fire barriers in the areas identified above:

- if there are no operable fire detectors in the area, establis, a continuous fire watch within one hour, or
- 2) if there are operable fire detectors on one side of the inoperable barrier, verify operability of the fire detectors and establish an hourly fire watch within one hour.

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> In all areas discussed above, including those involving structural steel, compensatory measures were immediately initiated upon identification. Areas previously identified in Reference 2, as a result of the original NRC Bulletin No. 92-01, already had compensatory measures in place.

> Fire detection systems exist which satisfy DAEC TS requirements for all areas identified in this letter. Therefore, compensatory measures in these areas consisted of establishing hourly fire watches.

### Requi ed Report

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 above actions. 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.

## IELP Response

By this letter we are notifying the NRC that the actions required have been taken. As stated in reference 2, the DAEC staff is reviewing our Thermo-Lag fire barrier system installations and bases. We will continue to monitor current industry testing for new data that should be applied to our Thermo-Lag installations and are actively participating in NUMARC efforts to reach a final resolution.

If you have any questions, please contact this office.

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This letter is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

John F. Frank, Jr.

Vice President, Nuclear

State of Iowa (County) of Linn

Signed and sworn to before me on this 1st day of October

1992, by Joha J. Transf A. attleen M. Furman Notary Public in and for the State of Iowa

September 28, 1995 Commission Expires

JFF/JMD/pjv-

:c: M. Davis J. Ertman L. Liu L. Root R. McGaughy C. Shiraki (NRC-NRR) A. Bert Davis (Region III) NRC Resident Office DCRC