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SUBJECT: Provides response to NRC Bulletin 92-001, "Failure of
 Thermo-Lag 330 Fire Barrier Sys to Maintain Cabling in Wide
 Cable Trays & Small Conducts Free from Fire Damage."
 Summary of Thermo-Lag configurations listed on encl.

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JUL 27 1992

R. B. STARKEY, JR.
Vice President
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SERIAL: NLS-92-204

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62

RESPONSE TO NRC BULLETIN NO. 92-01
FAILURE OF THERMO-LAG 330 FIRE BARRIER SYSTEM TO MAINTAIN CABLING IN WIDE
CABLE TRAYS AND SMALL CONDUITS FREE FROM FIRE DAMAGE

Gentlemen:

The purpose of this letter is to provide Carolina Power & Light Company's (CP&L) response to NRC Bulletin No. 92-01 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2), the Shearon Harris Nuclear Power Plant (SHNPP), and the Brunswick Steam Electric Plant, Unit Nos. 1 and 2 (BSEP).

On June 24, 1992, the NRC issued Bulletin No. 92-01, "Failure of Thermo-Lag 330 Fire Barrier System to Maintain Cabling in Wide Cable Trays and Small Conduits Free From Fire Damage." The Bulletin requested that all holders of operating licenses for nuclear power reactors take the following actions:

1. For those plants that use either one- or three-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 protecting either small-diameter conduit or wide trays (widths greater than 14 inches) that provide safe shutdown capability.
2. In those plant areas in which Thermo-Lag fire barriers are used to protect wide cable trays, small conduits, or both, 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.

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3. Each licensee, within 30 days of receiving this Bulletin, is required to provide a written notification stating whether it has or does not have Thermo-Lag 330 fire barrier systems installed in its facilities. Each licensee who has installed Thermo-Lag 330 fire barriers is required to inform the NRC, in writing, whether it has taken the above actions and is required to describe the measures being taken to ensure or restore fire barrier operability.

CP&L has utilized this material at BSEP and SHNPP. The material has not been utilized as a fire protective material at HBR2. A detailed review of plant drawings was performed, and some field walkdowns were performed to confirm the areas of the plant utilizing Thermo-Lag material. A summary of the plant areas and type of Thermo-Lag configurations is shown in Enclosures 1 and 2 for BSEP and SHNPP, respectively.

Compensatory measures associated with inoperable fire barriers were implemented on June 25, 1992 at BSEP and June 26, 1992 at SHNPP in accordance with plant procedures for configurations providing safe shutdown capability.

CP&L will continue to review BSEP and SHNPP plant configurations against approved test data in order to restore fire barrier operability. We will also review future direction provided through an industry program being coordinated by NUMARC to determine the appropriate actions necessary to restore fire barrier operability. CP&L will maintain the compensatory measures required by plant procedures until these barriers are returned to operable status.

Should you have questions regarding this matter, please contact Mr. David C. McCarthy at (919) 546-6901.

Yours very truly,



R. B. Starkey, Jr.

DBB/jbw

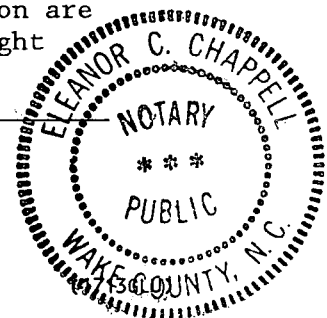
Enclosures

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
Mr. N. B. Le
Mr. R. H. Lo
Ms. B. L. Mozafari
Mr. R. L. Prevatte
Mr. J. E. Tedrow

R. B. Starkey, Jr., having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.


Notary (Seal)

My commission expires: 2/6/96



ENCLOSURE 1
SUMMARY OF THERMO-LAG CONFIGURATIONS
at Brunswick Steam Electric Plant

A review of the plant design drawings was performed to identify areas containing Thermo-Lag 330 fire barrier material. The table below provides a summary of this review.

The operability of the fire detectors were verified in the areas containing Thermo-Lag providing safe shutdown capability. Roving hourly fire watches were established to monitor the condition of these fire areas in accordance with the compensatory measures delineated within Plant Program Procedure PLP-01.2, Fire Protection System Operability and Action Requirements.

CONFIGURATION	LOCATION											
	REACTOR BLDG UNIT ONE BY ELEVATION				REACTOR BLDG UNIT TWO BY ELEVATION				DIESEL GENERATOR BLDG BY ELEV.		TURBINE BUILDING BY ELEV.	SERVICE WATER BLDG BY ELEV.
	-17'	20'	36'	50'	-17'	20'	36'	50'	23'	50'	20'	BELOW 20'
Conduit ≤ 1 inch diameter One Hour Rated												
Conduit ≤ 1 inch diameter Three Hour Rated												
Conduit > 1 inch diameter One Hour Rated												
Conduit/Pipe > 1 inch diameter Three Hour Rated												
Cable Trays One Hour Rated												
Flex A Blanket												
Fire Proof Panels Three Hour Rated												

* Shaded areas indicate Thermo-Lag applications.

ENCLOSURE 2
SUMMARY OF THERMO-LAG CONFIGURATIONS
at Shearon Harris Nuclear Power Plant

A review of the plant design drawings, periodic test procedure for fire wrap and a field walkdown was performed to identify areas containing Thermo-Lag 330 fire barrier material. The table below provides a summary of this review.

The operability of the fire detectors were verified in the areas containing Thermo-Lag providing safe shutdown capability. Roving hourly fire watches were established to monitor the condition of these fire areas in accordance with the compensatory measures delineated within Plant Procedure FPP-013, Fire Protection - Minimum Requirements and Mitigating Actions.

CONFIGURATION	LOCATION			
	REACTOR AUXILIARY BUILDING			
	236'	261'	286'	305'
Conduit ≤ 1 inch diameter One Hour Rated				
Conduit ≤ 1 inch diameter Three Hour Rated				
Conduit > 1 inch diameter One Hour Rated				
Conduit > 1 inch diameter Three Hour Rated				
Cable Trays One Hour Rated				
Flex A Blanket				
Fire Proof Panels Three Hour Rated				

* Shaded areas indicate Thermo-Lag applications.