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SUBJECT: Provides CP&L response to NRC Bulletin 92-001, Supplement 1,
 "Failure of Thermo-Lag 330 Fire Barrier Sys to Perform
 Specified Fire Endurance Function." Util will continue to
 review plant configurations against approved test data.

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R. B. STARKEY, JR.
Vice President
Nuclear Services Department

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, Supplement 1
FAILURE OF THERMO-LAG 330 FIRE BARRIER SYSTEM TO PERFORM ITS SPECIFIED FIRE
ENDURANCE FUNCTION

Gentlemen:

The purpose of this letter is to provide Carolina Power & Light Company's (CP&L) response to NRC Bulletin No. 92-01, Supplement 1 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 August 28, 1992, the NRC issued Bulletin No. 92-01, Supplement 1, "Failure of Thermo-Lag 330 Fire Barrier System to Perform Its Specified Fire Endurance Function." 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 the protection and separation of the safe-shutdown capability.
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 one- or three-hour barrier performance.

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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 No. 92-01.

CP&L Response

Carolina Power & Light Company has utilized this material at BSEP and SHNPP. The material has not been utilized as a fire protective material at HBR2. A summary of the plant areas and type of Thermo-Lag configurations provided in our initial response has been updated and is shown in Enclosures 1 and 2 for BSEP and SHNPP, respectively.

Carolina Power & Light Company had conservatively judged any Thermo-Lag installation to be suspect based upon the original NRC notification. Compensatory measures were implemented in accordance with plant procedures and Technical Specifications for affected areas containing Thermo-Lag 330 configurations which provide safe-shutdown capability.

Carolina Power & Light Company will continue to review plant configurations against approved test data. Future guidance provided through the industry program being coordinated by NUMARC will be reviewed to determine the appropriate actions required to resolve this issue. Carolina Power & Light Company will maintain the above compensatory measures until these configurations can be determined to be reliable in accordance with plant procedures and Technical Specifications. These measures are consistent with those outlined in CP&L's response to Bulletin No. 92-01 dated July 27, 1992.

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

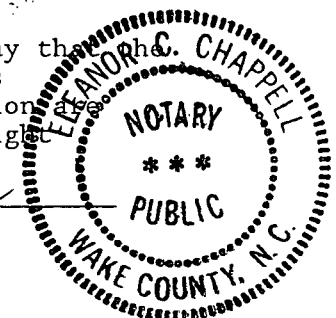
Enclosures

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 the officers, employees, contractors, and agents of Carolina Power & Light Company.


Notary (Seal)

My commission expires: 2/6/96



SUMMARY OF THERMO-LAG CONFIGURATIONS
at Brunswick Steam Electric Plant

The table below provides a summary of the various Thermo-Lag configurations which exist at the Brunswick Steam Electric Plant.

The operability of the fire detectors was verified in the areas containing Thermo-Lag 330 material providing safe-shutdown capability. Roving hourly fire watches have been established to monitor the condition of these fire areas in accordance with the compensatory measures delineated within Plant Procedure PLP-01.2, Fire Protection System Operability and Action Requirements, and Technical Specification 3.7.8, Fire Barrier Penetrations.

CONFIGURATION	LOCATION												
	REACTOR BLDG. UNIT ONE BY ELEVATION				REACTOR BLDG. UNIT TWO BY ELEVATION				DIESEL GEN. BLDG. BY ELEV.		TURBINE BLDG. BY ELEV.	CONTROL BLDG. BY ELEV.	SW BLDG. BY ELEV.
	-17'	20'	36'	50'	-17'	20'	36'	50'	23'	50'	20'	23'	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 Barrier Seals													
Fire-Proof Panels Three-Hour Rated													

* Shaded areas indicate Thermo-Lag applications.

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

The table below provides a summary of the Thermo-Lag 330 configurations which exist at the Shearon Harris Nuclear Power Plant.

The operability of the fire detectors was verified in the areas containing Thermo-Lag material providing safe-shutdown capability. Roving hourly fire watches have been 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.