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SUBJECT: Apprises of findings re fire barrier penetration seals & plan of action to assure integrity of 100% of fire barrier penetrations protecting safety-related areas, per 870205 telcon.

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CP&L

Carolina Power & Light Company

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February 13, 1987

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
INFORMATION REPORT ON FIRE BARRIER PENETRATION SEALS

Dear Sir:

This letter is provided as discussed in the conference call of February 5, 1987, concerning certain 3-hour fire barrier penetration seals in the Auxiliary Building.

Beginning in January 1987, an Operations Surveillance Test (OST) was implemented in accordance with the 18-month surveillance interval for inspection of 10 percent of the plant's fire barrier penetration seals for degradation. To date, inspection of 456 penetration seals has identified 41 which did not meet the original design requirements for a 3-hour rating. These seals have been or will be repaired and the penetrations returned to operable status within the 7-day limit of Technical Specification 3.14.7.2c.

The results of the OST indicate improper/inadequate installation techniques during the original sealing of the fire barrier penetrations to achieve a 3-hour rating.

It is CP&L's intent to inspect all penetration fire barriers protecting safety related areas. A best estimate of the time required to complete this inspection program is approximately six to nine months, based on the number of fire barrier penetrations, the difficulty imposed by certain penetrations' locations, and ALARA concerns. The inspections and repairs to date have been accomplished within the 7-day Technical Specification 3.14.7.2c limit; however, it is possible that certain future penetration inspections may result in exceeding this limit for the reasons given. The Robinson NRC Senior Resident Inspector will be notified should this situation be encountered.

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Fire barrier penetration seals are a passive element in the facility fire protection program. Their operability is intended to minimize the possibility of a single fire rapidly involving several areas of the facility prior to detection and extinguishment. During periods of time when the seals are inoperable, verification of fire detection system operability within one hour as required by Technical Specification 3.14.7.2a insures that prompt detection capability exists in the vicinity of the penetration barrier. Should an area detection system be inoperable, a continuous fire watch would be established within one hour as required by Technical Specification 3.14.7.2b to provide the required protection until the seal is restored to operable status. Throughout the inspection period, the fire detection system operability will also be verified once per shift as additional compensatory action.

The Fire Detection and Actuation System (FDAS) is designed for early warning and to monitor detection malfunctions via electrically supervised detection circuits. The system continuously monitors for the presence of fire to provide prompt alarm and actuation of appropriate automatic fixed fire suppression systems and equipment. The FDAS provides centralized control of detection, annunciation, and actuation for plant fire protection systems. It is composed of two independent redundant trains of detection, with each train consisting of detectors, alarms, control devices, and remote annunciator/status indicators in the Unit 2 Control Room.

In summary, this letter is provided to apprise you of CP&L findings on fire barrier penetration seals and of the plan of action to assure the integrity of 100 percent of the fire barrier penetrations protecting safety related areas. Although no 30-day Special Report pursuant to Technical Specification 3.14.7.2c is required since all discrepant seals thus far will have been repaired within seven days of their discovery, this report provides the required information. The Robinson NRC Senior Resident Inspector will be advised of changes to the plan.

If you have any questions concerning this submittal, please contact my staff.

Very truly yours,

R. E. Morgan
General Manager
H. B. Robinson S. E. Plant

DAS:gjh

cc: Mr. P. E. Fredrickson
Dr. J. N. Grace