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 RECIP. NAME RECIPIENT AFFILIATION
 MURLEY, T.E. Document Control Branch (Document Control Desk)

SUBJECT: Responds to Suppl 1 to NRC Bulletin 92-001, "Failure of
 Thermo-Lag 330 Fire Barrier Sys to Perform Specified Fire
 Endurance Function." Fire watches posted in plant areas
 where subj matl utilized as 1 h or 3 h barrier.

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AEP:NRC:1176A

Donald C. Cook Nuclear Plant Units 1 and 2
License Nos. DPR-58 and DPR-74
Docket Nos. 50-315 and 50-316
RESPONSE TO NRC BULLETIN 92-01, SUPPLEMENT 1,
"FAILURE OF THERMO-LAG 330 FIRE BARRIER SYSTEM
TO PERFORM ITS SPECIFIED FIRE ENDURANCE FUNCTION"

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Attn: T. E. Murley

October 5, 1992

Dear Dr. Murley:

This letter provides our response to NRC Bulletin 92-01, Supplement 1 as it applies to the Donald C. Cook Nuclear Plant. The supplement expands the scope of the original bulletin to include all sizes of conduits and cable trays, as well as, walls, ceilings, and equipment enclosures. In addition, the supplement also adds the requirement that 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. The specific information requested in the bulletin is provided in the attachment to this letter.

In summary, as a result of Bulletin 92-01, fire watches were posted in the areas of Cook Nuclear Plant where Thermo-Lag 330 material was utilized as a 1- or 3-hour barrier to protect safe shutdown equipment, including all sizes of conduits, walls, ceilings, and equipment enclosures. Consequently, the additional scope contained in Supplement 1 to the bulletin does not result in an increase in the compensatory measures previously taken at Cook Nuclear Plant, as delineated in our response to Bulletin 92-01 in AEP:NRC:1176.

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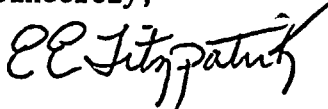
Dr. T. E. Murley

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AEP:NRC:1176A

Our response to NRC Bulletin 92-01, Supplement 1 was requested to be made under oath or affirmation according to the provisions of Section 182a of the Atomic Energy Act of 1954, as amended, and 10 CFR 50.54(f). As such, an oath is included with this letter.

Sincerely,



E. E. Fitzpatrick
Vice President

tjw

Attachment

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
J. R. Padgett
G. Charnoff
NFEM Section Chief
A. B. Davis - Region III
NRC Resident Inspector - Bridgman

ATTACHMENT TO AEP:NRC:1176A

INFORMATION REQUESTED IN NRC BULLETIN 92-01, SUPPLEMENT 1

Supplement 1 to NRC Bulletin 92-01 asks licensees to take two immediate actions upon receiving the bulletin supplement. This attachment provides a summary of the actions taken to address these requests. The responses provided are applicable to Units 1 and 2 of Cook Nuclear Plant.

1. NRC Request

"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

All areas containing Thermo-Lag 330 installed to meet Appendix R requirements and requiring compensatory measures were previously identified in AEP:NRC:1176. This included fire zone 44S where Thermo-Lag 330 was used in the construction of a 3-hour fire barrier erected to prevent the spread of fire between Unit 1, Unit 2, and spare Component Cooling Water pumps. Although Thermo-Lag 330 was also installed on a number of hatches, technical evaluations of the hatches included in Section 9 of the Safe Shutdown Capability Assessment take no credit for this material for Appendix R purposes. Consequently, fire watches need not survey the subject hatches.

AEP:NRC:1176 also pointed out that a small amount of Thermo-Lag material was used on the structural support of instrumentation located in Fire Zones 122 and 123 inside containment, and that the application of this material was not related to one-hour or three-hour barrier compliance. Further evaluation of this installation has not resulted in a change in the original conclusion that this material was applied as an engineering conservatism for the purpose of limiting heat transfer to the instrumentation and, as such, compensatory actions are not necessary. This is consistent with the past treatment of this installation as not being a fire rated assembly covered by Technical Specification 3.7.10.

2. NRG Request

"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."

Response

As a result of NRC Bulletin 92-01, the areas where Thermo-Lag 330 material is utilized as a 1- or 3-hour barrier to protect safe shutdown equipment have either a roving or a stationary fire watch posted. Until such time that AEPSC has evidence that indicates that the fire barriers installed at Cook Nuclear Plant to protect safe shutdown equipment from fire damage are not only capable of performing their intended function, but satisfy Cook Nuclear Plant's licensing and design basis, fire watches will remain in effect.

STATE OF OHIO)
COUNTY OF FRANKLIN)

E. E. Fitzpatrick, being duly sworn, deposes and says that he is the Vice President of licensee, Indiana Michigan Power Company, that he has read the foregoing Response to NRC Bulletin 92-01, Supplement 1, "Failure of Thermo-Lag 330 Fire Barrier System to Perform its Specified Fire Endurance Function," and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.

E E Fitzpatrick

Subscribed and sworn to before me this 6th
day of October, 19 92.

Rita D. Hill
NOTARY PUBLIC
RITA D. HILL
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 6-28-94



Year	United States (%)	Japan (%)	Germany (%)
1950	7	7	15
1960	8	8	16
1970	9	10	17
1980	10	13	17
1990	11	16	17
2000	12	18	17
2010	13	19	17
2020	14	20	17
2030	14.5	20	17.5
2040	15	20	18
2050	15	20	18

