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 PLUNKETT, T.F. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards NRC Bulletin 92-001, "Failure of Thermo-Lag 330
 Fire Barrier Sys to Maintain Cabling in Wide Cable Trays &
 Small Conduits Free Fire Damage."

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

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
NRC Bulletin 92-01
Failure of Thermo-Lag 330 Fire Barrier System to Maintain Cabling
in Wide Cable Trays and Small Conduits Free From Fire Damage

NRC Bulletin 92-01, issued June 24, 1992, requested that licensees take appropriate compensatory measures and corrective actions for conduits and cable trays where the use of preformed Thermo-Lag 330 fire barriers may make the operability of the contained cables indeterminate. In accordance with the bulletin, Florida Power and Light Company provides the attached response relative to the Turkey Point plant.

Should there be any questions regarding this information, please contact us.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear

TFP/CLM/cm

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
R.C. Butcher, Senior Resident Inspector, USNRC, Turkey Point Plant

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PDR-ADOCK 05000250
Q PDR

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

T. F. Plunkett being first duly sworn, deposes and says:

That he is Vice President, Turkey Point Nuclear Plant, of Florida Power and Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.

T. F. Plunkett
T. F. Plunkett

Subscribed and sworn to before me this

23 day of July, 1992.

Barbara J. Walker

Barbara J. Walker
Name of Notary Public (Type or Print)

NOTARY PUBLIC, in and for the County of Dade, State of Florida

My Commission expires AA 710555
Commission No. AA 710555
NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP SEPT. 26, 1993
BONDED THRU GENERAL INS. WRD.

T. F. Plunkett is personally known to me.

ATTACHMENT

FLORIDA POWER AND LIGHT

TURKEY POINT UNITS 3 AND 4

NRC BULLETIN 92-01

**Failure of Thermo-Lag 330 Fire Barrier System to Maintain Cabling
in Wide Cable Trays and Small Conduits Free From Fire Damage**

Florida Power and Light provides the following information relative to Turkey Point Units 3 and 4 in response to NRC Bulletin 92-01:

Requested Action 1

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 protecting either small diameter conduit or wide trays (widths greater than 14 inches) that provide safe shutdown capability.

FPL Response

Turkey Point plant locations which have Thermo-Lag 330 fire barrier installations have been identified. The specific plant locations with small diameter conduit and/or wide tray Thermo-Lag applications have been determined. "Small" conduit was clarified at the July 7, 1992, NRC/NUMARC meeting as meaning conduit with a diameter of less than four inches. Turkey Point uses Thermo-Lag 330 fire barrier material in 39 fire zones to protect small conduit or wide trays that provide safe shutdown capability. Of these fire zones, 20 also contain automatic fire detection.

Requested Action 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.

FPL Response

Following analysis of the requested actions of NRC Bulletin 92-01, on June 26, 1992, Turkey Point implemented compensatory measures in the form of additional fire watches for all applicable locations which do not have fire detection. This compensation resulted in each applicable area without fire detection being observed at least once every 10 to 15 minutes.

Subsequently, beginning July 14, 1992, a closed circuit television system comprising 39 cameras and 10 monitors was placed in service, covering the 19 fire zones which do not have installed fire detectors. Each monitor cycles through 4 camera displays approximately every 80 seconds (approximately 20 seconds per camera). The 10 monitors are viewed continuously by a dedicated operator who is trained as a fire watch. The failure of a camera, cable, or monitor can be detected from the monitor location.

This closed circuit television system provides for continuous monitoring of applicable locations by a fire watch. An hourly fire watch also checks these 19 fire zones. In addition, for the 20 fire zones in which installed fire detectors were verified operable, hourly fire watch patrols were established.

These compensatory measures are consistent with the Limiting Condition for Operation for Turkey Point Units 3 and 4 Technical Specification 3.7.9, which states:

"With one or more of the [above] required fire rated assemblies [and/or sealing devices] inoperable, within 1 hour either establish a continuous fire watch on at least one side of the affected assembly, or verify the OPERABILITY of fire detectors on at least one side of the inoperable assembly and establish an hourly fire watch patrol."

These compensatory measures will remain in place until corrective actions are taken to assure the operability of the fire barriers; however, the specific camera configuration and fire watch assignments may change based on experience gained during use of the system.

Requested Action 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.

FPL Response

Turkey Point does have Thermo-Lag 330 fire barrier systems installed in its facility as discussed in the response to Requested Action 1 above. Compensatory measures have been implemented as discussed in the response to Requested Action 2 above. The continuing measures being taken to ensure or restore fire barrier operability include:

- participation in NUMARC activities on the subject
- observation and evaluation of additional testing of Thermo-Lag fire barriers
- engineering evaluation of location-specific fire response characteristics and safe shutdown analysis
- other actions arising from the measures listed above

