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Georgia Power

the southern electric system

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Vice President, Nuclear
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June 30, 1992

ELV-03871
001943

Docket Nos. 50-424
50-425

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
NRC BULLETIN 92-01

During a conversation with the NRC on June 26, 1992, concerning NRC Bulletin 92-01, Georgia Power Company (GPC) committed to provide information describing any deviations from the approved fire protection program resulting from the plant review in response to the bulletin.

In Final Safety Analysis Report (FSAR) table 9.5.1-10 (sheet 10 of 11) concerning fire-rated assemblies, action 7.3 states:

"With one or more of the above required fire barriers and/or fire-rated assemblies inoperable, within 1 h either establish a continuous fire watch on at least one side of the affected assembly, or verify the operability of fire detectors at least one side of the inoperable assembly and establish an hourly fire patrol."

For the five rooms inside containment (Unit 1 - A02, B02, and B03 and Unit 2 - B02 and B03) which contain conduit coated with Thermo-lig 330 insulation, GPC has initiated a program to monitor air temperature inside the containment at least once per hour using the instrumentation listed in Technical Specification 4.6.1.5. This program will be used instead of entering the containment to perform an hourly fire patrol.

Georgia Power Company feels this action is justified because the cables at Vogtle Electric Generating Plant (VEGP) are routed and separated as allowed in IEEE Std. 384-1981 and in accordance with Regulatory Guide 1.75. Vogtle Electric Generating Plant has utilized extensive testing to justify reduced criteria for cable separation. These tests were performed by WYLE Laboratories and involved many different raceway configurations and cable types. These tests indicate that cable in conduit is adequately protected from electrical faults and resulting combustion of cable insulation that may occur in nearby trays. A separation distance between the conduit and the cable tray of one-half inch is acceptable.

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TELL ADD 1/D

U. S. Nuclear Regulatory Commission

ELV-03871

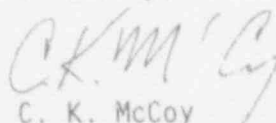
Page 2

Consequently, even if the Thermo-lag wrap material protection is questioned, if the source of the fire is an electrical fault and the only combustibles contributing to the fire are cable insulation, these tests have shown that no further protection is needed other than the conduit.

In addition, transient combustibles are strictly limited inside containment during power operation. All materials taken into or out of containment are accounted for. The only reasonable fire source that could affect these circuits would be due to a cable fault, and as stated above, conduit alone has been shown to adequately protect cables in conduit from the effects of electrical cable faults at VEGP. Therefore, because of the limited combustibles, control of transients, separation between redundant protected circuits, monitoring of air temperature, and the fire detection provided, a fire watch inside containment does not justify the radiation dose that would be received by performance of hourly fire watches.

This is the only deviation to our current program. Should you have any questions, please inquire.

Sincerely,


C. K. McCoy

CKM/JAB/gmb

xc: Georgia Power Company
Mr. W. B. Shipman
Mr. M. Sheibani
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebnetter, Regional Administrator
Mr. D. S. Hood, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle