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Georgia Power

the standard electric system

HL-2921
004024

September 25, 1992

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

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
RESPONSE TO NRC BULLETIN NO. 92-01, SUPPLEMENT 1

Gentlemen:

On August 28, 1992, the NRC issued NRC Bulletin No. 92-01, Supplement 1, "Failure of Thermo-Lag 330 Fire Barrier System to Perform its Specified Fire Endurance Function." The bulletin supplement notified licensees of failures in fire endurance testing of the Thermo-Lag 330 fire barrier system and requested all licensees to take specific actions.

The enclosure to this letter describes the actions which have been taken in response to NRC Bulletin No. 92-01, Supplement 1, and the measures being taken to ensure or restore fire barrier operability.

Mr. J. T. Beckham, Jr. states he is duly authorized to execute this oath on behalf of Georgia Power Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

GEORGIA POWER COMPANY

BY:

J. T. Beckham, Jr.
J. T. Beckham, Jr.

Sworn to and subscribed before me this 24th day of September 1992.

Joe Ellen Harder
Notary Public

MCM/cr

MY COMMISSION EXPIRES JUNE 30, 1995

Enclosure

cc: (See next page.)

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U.S. Nuclear Regulatory Commission

September 25, 1992

Page Two

cc: Georgia Power Company

Mr. H. L. Sumner, General Manager - Nuclear Plant
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebner, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

State of Georgia
Mr. J. D. Tanner, Commissioner - Department of Natural Resources

ENCLOSURE

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
RESPONSE TO NRC BULLETIN NO. 92-01, SUPPLEMENT 1

Bulletin 92-01, Supplement 1, Item 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 the protection and separation of the safe shutdown capability."

GPC Response to Item 1:

On August 31, 1992, GPC received an advance copy of NRC Bulletin No. 92-01, Supplement 1. Hatch personnel immediately initiated actions in response to the bulletin. The architect engineer (AE) was contacted and requested to begin a review of drawings and other documentation to determine the areas of the plant which have Thermo-Lag 330 fire barrier material installed to provide safe shutdown capability but were not previously identified as meeting the criteria of the original NRC Bulletin 92-01. The following areas were identified as meeting the criteria of the bulletin supplement:

<u>Fire Zone</u>	<u>Description of Area</u>
1023	Unit 1 Lube Oil Conditioner & Reservoir Room Walls
2023	Unit 2 Lube Oil Conditioner & Reservoir Room Walls

Bulletin 92-01, Supplement 1, Item 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 1- or 3-hour barrier performance."

GPC Response to Item 2:

The Plant Hatch fire protection program requirements are contained in the "Edwin I. Hatch Nuclear Plant Units 1 and 2 Fire Hazards Analysis and Fire Protection Program" (FHA). Appendix B of the FHA addresses fire protection operability and surveillance requirements, and requires all fire-rated assemblies necessary for safe shutdown to be operable at all times. The Action statement for inoperability of these assemblies is as follows:

ENCLOSURE (Continued)

RESPONSE TO NRC BULLETIN NO. 92-01, SUPPLEMENT 1

- "a. With one or more of the above required fire-rated assemblies and/or sealing devices inoperable or with the required surveillance interval (including grace period) exceeded, within 1 hour establish a continuous fire watch on at least one side of the affected assembly(s) and/or sealing device(s) or verify the OPERABILITY of fire detectors on at least one side of the inoperable assembly(s) and sealing devices(s) and establish an hourly fire patrol.
- b. Restore the inoperable fire-rated assembly(s) and/or sealing devices to OPERABLE status within 14 days or prepare and submit a special report to the Commission within the next 30 days per Technical Specification 6.9.2."

As previously stated, two areas in addition to those identified in response to NRC Bulletin 92-01, have been identified as employing Thermo-Lag 330 for the protection of safety shutdown equipment. The affected fire zones (1023 and 2023) have installed operable fire detection systems. Therefore, an hourly fire watch patrol, rather than a continuous fire watch, is required. This information was relayed to site personnel, and the new areas were added to the fire watch patrol on September 4, 1992.

In addition to fire watches, the FHA requires a special report to the NRC if the subject fire barriers are not restored to operability within 14 days. It is anticipated the fire barriers which meet the criteria of the bulletin supplement will be considered inoperable for greater than 14 days; thus, a special report would be required. However, this letter discusses the subject fire barriers, the compensatory actions taken, and the planned actions for restoration of fire barrier operability and, therefore, fulfills the requirements of the special report. No additional report will be submitted.

At this time, no specific long term resolution of the Thermo-Lag fire barrier deficiencies has been defined. The industry is currently working through NUMARC in an attempt to determine the actions necessary to resolve this issue. Fire watches will remain in place until required actions on the subject fire barriers are identified and implemented.