CENTERIOR ENERGY

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Subject: Fire Protection: Response to NRC Bulletin 92-01, Supplement 1, Failure of Thermo-Lag 330 Fire Barrier System to Perform its Specified Fire Endurance Function

Gentlemen:

Toledo Edison (TE) received Nuclear Regulatory Commission (NRC) Bulletin 92-01, Supplement 1, "Failure of Thermo-Lag 330 Fire Barrier System to Perform its Specified Fire Endurance Function", on August 31, 1992 (TE Log Number 1-2726). Bulletin 92-01, Supplement 1, provided notification of additional apparent failures in fire endurance testing associated with the Thermo-Lag 330 fire barrier system, requested that all operating reactor licensee take NRC-recommended actions and required that a written response be provided to the NRC describing the actions taken associated with Bulletin 92-01, Supplement 1. This letter provides TE's response to Bulletin 92-01, Supplement 1, as applicable to the Davis-Besse Nuclear Power Station (DBNPS). This letter supplements TE's response to NRC Bulletin 92-01 submitted on July 29, 1992 (TE letter Serial Number 2076).

NRC 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 protection and separation of the safe shutdown capability.

JE49

Action Taken

1. In addition to the ten rooms identified in TE's July 29, 1992 letter that have conduit with the Thermo-Lag 330 fire barrier system, TE has determined that there are eleven rooms with structural steel protected by the Thermo-Lag 330 fire barrier system (three of these rooms also have conduit protected by the Thermo-Lag 330 fire barrier system). Additionally, the Thermo-Lag 330 fire barrier system is used by TE to protect fire dampers in five rooms (see Attachment for a listing of the rooms where the Thermo-Lag 330 fire barrier system is used).

NRC Requested Action

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.

Action Taken

2. On September 1, 1992, TE established hourly fire watch patrols as compensatory measures in the rooms where the Thermo-Lag 330 fire barrier system is used for the protection and separation of the safe shutdown capability. These compensatory actions are consistent with those that would be implemented by the DBNPS Technical Specifications for an inoperable fire barrier.

As the qualification of the Thermo-Lag 330 fire barrier system is an unresolved generic industry concern, TE intends to continue to follow, evaluate, and participate in industry activities to resolve this issue.

If you have any questions, please contact Mr. R. W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,

KBR/dlc

cc: A. E. Bradley, NUMARC
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List of Rooms at the Davis-Besse Nuclear Power Station
Using Thermo-Lag 330 Fire Barrier System
to Protect and Separate the Safe Shutdown Capability

Room No.	Description	Application
53	Service Water Valve Room	Conduit
105	Emergency Core Cooling System Pump Room 1-1	Conduit Structural steel
110/110A	Corridor	Structural steel
113A*	Hatch Area	Conduit Structural steel
114	Miscellaneous Waste Monitor Tank and Pump Room	Conduit Structural steel
225	Make-up Pump Room	Structural steel
304	Corridor	Structural steel
313	Hatch Area	Conduit
314	No. 4 Mechanical Penetration Room	Conduit
323	High Voltage Switchgear Room B	Conduit
324	Auxiliary Shutdown Panel and Transfer Switch Room	Conduit
325	High Voltage Switchgear Room A	Structural steel
328	Component Cooling Water Heat Exchanger and Pump Room	Conduit
331	Auxiliary Steam Boiler Room	Damper
400	Equipment Hatch Area Passage	Structural steel
401	Fuel Handling Exhaust Unit Room	Structural steel
404	Corridor	Structural steel
427	No. 2 Electrical Penetration Room	Conduit
428	Low Voltage Switchgear Room F-Bus	Structural steel

List of Rooms at the Davis-Besse Nuclear Power Station
Using Thermo-Lag 330 Fire Barrier System
to Protect and Separate the Safe Shutdown Capability

Room No.	Description	Application
431	Turbine Area	damper
504	Control Room Kitchen	damper
507	Shift Supervisor Office	damper
509	Control Room Passage	damper

* Continuation of same conduit from Room 105