

Detroit
Edison

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Nuclear
Operations

September 30, 1992
NRC-92-0116

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

- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. WPF-43
 - 2) NRC Bulletin No. 92-01, "Failure of Thermo-Lag 330 Fire Barrier System to Maintain Cabling in Wide Cable Trays and Small Conduits Free From Fire Damage", dated June 24, 1992.
 - 3) Detroit Edison Letter to NRC, "Detroit Edison Response to NRC Bulletin 92-01", NRC-92-0091, dated July 23, 1992
 - 4) NRC Bulletin No. 92-01, supplement 1, "Failure of Thermo-Lag 330 fire Barrier System to Perform its Specified Fire Endurance Function", dated August 28, 1992

Subject: Detroit Edison Response to NRC Bulletin 92-01, Supplement 1

The purpose of this letter is to provide Detroit Edison's response to Bulletin 92-01, Supplement 1 (Reference 4) which was received on August 31, 1992. This bulletin provided notification of additional failures in fire endurance testing of the Thermo-Lag 330 Fire Barrier System; expanded the scope of the bulletin to include raceways, walls, ceilings, equipment enclosure, and cable trays and conduits of all sizes; requested licensees to take the recommended actions; and required a written response within 30 days of receiving this supplement describing the actions taken in response to this bulletin.

Accordingly, pursuant to the oath and affirmation requirements of 10CFR50.54(f), Detroit Edison has reviewed Bulletin 92-01, Supplement 1 and provides the information required under the "Requested Actions" of the bulletin. As requested, a copy is also being submitted to the Regional Administrator, U.S. NRC Region III.

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Upon receipt of Bulletin 92-01, (Reference 2) Detroit Edison took immediate actions to identify the areas of the plant which have Thermo-Lag 330 material and to implement the appropriate compensatory measures. Detroit Edison's response to Bulletin 92-01 was submitted by Reference 3.

Detroit Edison reviewed identified eleven areas in the plant where Thermo-Lag material is installed. Two (2) of the eleven (11) areas use this material to protect cable trays and conduits, and were identified in Reference 3. Both of these areas have an automatic fire detection system and in response to Bulletin 92-01, a roving hourly fire watch patrol was established for these two areas as a compensatory measure.

For the remaining nine (9) areas, the Thermo-Lag 330 material is used as blackout closures in fire barriers and as wall and ceiling fire barriers in the Auxiliary Building. Detroit Edison has also established a roving hourly fire watch patrol for these additional 9 areas as a compensatory measure. These nine areas are as follows:

- o Between the Relay Room (Fire Zone 3) and the stairwell (Fire Zone 9) on elevation 613'6" at column H-17.
- o Between The Mermaine (Fire Zone 2) and the HVAC chase at elevation 613'6" at column H-10.
- o Between the Cable Tunnel (Fire Zone 5) and the Cable Spreading Room (Fire Zone 7) at elevation 603'6" at column G-13.
- o Between the Cable Tunnel (Fire Zone 5) and the Cable Tray Area (Fire Zone 8) at elevation 631'0" at column G-11.
- o Between the Relay Room (Fire Zone 3) and the base of an HVAC chase at elevation 630'6" near the southwest corner of the Cable Spreading Room (Fire Zone 7) at column F-13.
- o Between the Ventilation Equipment Area (Fire Zone 13) and the chase on elevation 659'6" at column F-9.
- o Between the Division I and Division II return air fans in the CCHVAC Room (Fire Zone 14) equipment on elevation 677'6" at column G-17.
- o Two (2) locations on the barrier between the CCHVAC equipment room (Fire Zone 14) and the small HVAC room (Fire Zone 9) on elevation 677'6".

All these areas have automatic fire detection systems, except the small HVAC room (Fire Zone 9) where the combustible loading is extremely low.

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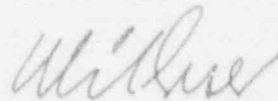
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In addition to the continuing fire watches, Detroit Edison has prepared an engineering evaluation of the Thermo-Lag fire barrier material to ensure that it does not present any undue risk to the plant or adversely affect the plant's ability to achieve and maintain safe shutdown. The evaluation has concluded that the Thermo-Lag 330 fire barriers do not reduce the level of safety provided by the Fermi 2 Fire Protection Program and the safe shutdown capabilities are not adversely affected.

Appropriate actions to restore fire barrier integrity are being developed through an industry program being coordinated by NUMARC. This program will include establishment of a test database, development of guidance for applicability of tests, development of generic installation guidance, and consideration and coordination of additional testing as appropriate. When completed, Detroit Edison will apply the results of these efforts, if applicable, to the Thermo-Lag installations at Fermi 2.

If you have any questions, please contact Mr. Girija S. Shukla at (313) 586-4270.

Sincerely,



cc: B. Bradley (NUMARC)
T. G. Colburn
A. B. Davis
M. P. Phillips
S. Stasek
J. Silberg (Shaw, Pittman, Potts & Trowbridge)

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I, WILLIAM S. ORSER, do hereby affirm that the foregoing statements
are based on facts and circumstances which are true and accurate to
the best of my knowledge and belief.

William S. Orser

WILLIAM S. ORSER

Senior Vice President

On this 30th day of September, 1992, before me
personally appeared William S. Orser, being first duly sworn and
says that he executed the foregoing as his free act and deed.

Rosalie A. Armetta

Notary Public

ROSALIE A. ARMETTA
NOTARY PUBLIC STATE OF MICHIGAN
MONROE COUNTY
COMMISSION EXP. NOV. 20, 1995