

Docket File



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

April 30, 1997

LICENSEE: PECO Energy Company (PECO)  
FACILITY: Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3  
Limerick Generating Station (LGS), Units 1 and 2  
SUBJECT: SUMMARY OF APRIL 14, 1995 MEETING BETWEEN NRC AND PECO, RESOLUTION  
OF THERMO-LAG CONCERNS, PEACH BOTTOM ATOMIC POWER STATION, UNITS 2  
AND 3, AND LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS.  
M85586, M85587, M85565 AND M85566)

On April 14, 1997, the NRC staff met with representatives of PECO Energy Company (PECO, the licensee) at the NRC offices in Rockville, Maryland, to discuss issues associated with the use of Thermo-Lag fire barrier material at PBAPS and LGS. A list of meeting participants is enclosed (Enclosure 1). Also enclosed is a copy of PECO's meeting handout (Enclosure 2).

In introductory remarks, the NRC staff stated that it was interested in expeditiously resolving concerns with the effectiveness of Thermo-Lag 330 as a fire barrier in nuclear power plants. Concerns with the effectiveness of Thermo-Lag are described in NRC Generic Letter (GL) 92-08, "Thermo-Lag 330-1 Fire Barriers," and other NRC generic communications. The staff expressed interest in understanding PECO's plans and schedules for the resolution of these concerns at PBAPS and LGS. The licensee stated that it was prepared to provide that information as well as information on its accomplishments to date in this area.

PECO began its presentation by describing the scope of Thermo-Lag use at PBAPS and LGS. Approximately 4800 linear feet and 4400 linear feet of Thermo-Lag is installed at LGS and PBAPS respectively, in both 1-hour and 3-hour fire barrier applications, encompassing cable trays, conduits, junction boxes and gutter ways. Since 1992, PECO has implemented compensatory measures, primarily roving fire watches, while the Thermo-Lag corrective action program is completed.

PECO stated that its overall approach since 1992 has been to resolve Thermo-Lag issues in a cost effective manner while ensuring plant safety. PECO described a number of integrated activities it has conducted, or is conducting as part of its overall resolution plan. These activities include a complete safe shutdown re-analysis for both PBAPS and LGS, completion of fire risk analyses associated with the Generic Letter 88-20, Individual Plant Examination for External Events (IPEEE), evaluation of existing Thermo-Lag configurations and evaluation of alternative fire barrier materials. PECO stated that one additional goal of the project is to significantly upgrade the fire protection program documentation for each plant.

With regard to the overall schedule, PECO stated that its schedule for full regulatory compliance was driven by the potential to perform major

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modifications at either PBAPS or LGS, and that the major modification schedule was driven by the need to perform such modifications during bi-annual refueling outages. PECO's current schedule is to be in full compliance with associated regulatory requirements by April 1999 for LGS (Unit 2) and October 1999 for PBAPS (Unit 3).

To date, PECO indicated that it has completed and submitted the IPEEE fire risk analysis for both PBAPS and LGS. PECO also stated that it has identified the revised safe shutdown configuration in terms of necessary equipment, necessary manual operator action and the reliance on fire barrier electrical raceway protection for protection of the necessary equipment. PECO indicated that the revised analysis will provide for a potential 70% reduction in the amount of Thermo-Lag relied upon to achieve and maintain safe shutdown in accordance with NRC fire protection requirements. In addition, PECO has identified and approved for conceptual design the necessary major modifications needed to support the revised analysis.

PECO described the evaluations it has performed on the existing Thermo-Lag configurations including identification of which PECO fire barrier assemblies were bounded by industry tests, and which PECO configurations required the development of PECO-specific tests. PECO described the Thermo-Lag composition verification program it had completed and the revisions to combustible loading analyses that had been required based on the known combustible nature of Thermo-Lag. PECO described briefly its participation in industry Thermo-Lag testing programs.

PECO explained the scope of remaining analytical and modification work required to meet the schedule commitments. In the handout, PECO described the process and general schedule on which all modifications are developed with respect to the outage in which they are to be installed. PECO also described the general modification review criteria for modifications related to Thermo-Lag reduction including consideration of the type of plant operations window required for completing installation and testing while meeting radiological dose minimization objectives. For one modification each for PBAPS and LGS, PECO described how the review criteria established the commitment schedule of April 1999 for LGS and October 1999 for PBAPS.

PECO concluded by stating that it was committed to and on track for meeting the stated completion target dates. PECO did state that it planned to submit one exemption request for PBAPS and a deviation for LGS with regard to the requirement to have fire suppression equipment in addition to one-hour rated fire barriers in certain areas of the plant and would submit its requests by May 1997.

Throughout the meeting, the NRC stated that it is concerned that PECO's resolution schedule is excessive and challenged the licensee on considering methods to improve on the implementation schedule for as much of the project as possible. The staff commented for instance, that PECO should examine the possibility of performing pre-modification design plant walkdowns during

forced outages rather than waiting for the next Unit 3 refueling outage. In this instance, PECO estimated that the associated walkdowns for the PBAPS fire area wall modification would take approximately 80 man hours and would require extensive scaffolding. PECO indicated that it would consider performing the walkdowns during forced outages but that the frequency of and duration of forced outages at PBAPS and LGS in recent years did not make it likely that the walkdowns could be done prior to the refueling outage.

The staff did not obtain a clear understanding of the reasons for the licensee's schedule. The staff closed by stating that it was interested in understanding in more detail the scope of the remaining work and indicated that it would seek additional dialogue or another meeting to review the scope of the remaining work.

/S/  
Joseph W. Shea, Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-277/278  
and 50-352/353

Enclosures: 1. Meeting Attendees  
2. Licensee's Meeting Handout

cc w/encls: See next page

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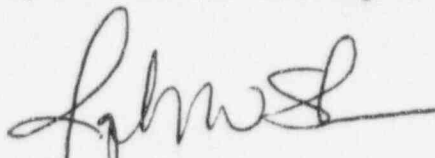
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DATE	4/29/97	4/29/97	4/28/97	4/30/97	

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Meeting Attendance List

NRC/PECO Energy Company

April 14, 1997

	<u>NAME</u>	<u>ORGANIZATION</u>
1.	D. Fetters	PECO Nuclear
2.	J. Cotton	PECO Nuclear
3.	G. Hunger	PECO Nuclear
4.	G. Spinka	PECO Nuclear
5.	C. Bruce	PECO Nuclear
6.	A. Marie	PECO Nuclear
7.	A. Cross-Dial	PECO Nuclear
8.	C. Pragman	PECO Nuclear
9.	J. Hufnagel	PECO Nuclear
10.	D. Salek	PECO Nuclear
11.	J. Davenport	PECO Nuclear
12.	A. Thadani	NRR/ADT
13.	L. Marsh	NRR/SPLB
14.	E. Connell	NRR/SPLB
15.	D. Oudinot	NRR/SPLB
16.	R. Jenkins	NRR/EELB
17.	J. Shea	NRR/PDI-2
18.	F. Rinaldi	NRR/PDI-2
19.	M. Hart	NRR/PDI-2
20.	C. Poslusny	NRR/PDI-2
21.	L. Tran	NRR
22.	S. Maingi	Pennsylvania Bureau of Radiation Protection
23.	F. Emerson	Nuclear Energy Institute
24.	H. Abendroth	Atlantic Electric
25.	B. Knieriem	Delmarva Power
26.	E. Wenzinger	NUS-LIS
27.	T. Sutter	Bechtel
28.	E. Holub	EPH Solutions

Enclosure 1

# **Fire Protection Compliance: Thermo-Lag 330-1 Operability Resolution Schedule Review**

**Presented To:**            **The U. S. Nuclear Regulatory Commission**  
                                 **April 14, 1997**

**Presented By:**        **PECO Energy Company**  
                                 **Limerick Generating Station**  
                                 **Peach Bottom Atomic Power Station**



# PECO Energy Participants

## ■ Presenters

- D.B. Feters, Vice President, Station Support
- A.J. Marie, PSA Branch Manager
- C.D. Bruce, Fire Protection Program Manager
- G.L. Spinka, Thermo-Lag Project Manager

## ■ Attendees

- J.B. Cotton, Director, Nuclear Engineering
- G. .A. Hunger, Jr, Director, Licensing
- A.E. Cross-Dial, Thermo-Lag Licensing Engineer
- D.A. Salek, LGS Modification Project Manager
- J.K. Davenport, PBAPS Modification Project Manager
- C.J. Pragman, Safe Shutdown Program Manager

# Purpose

- Review PECO Energy's Thermo-Lag Resolution Schedule
  - Limerick Generating Station (LGS)
  - Peach Bottom Atomic Power Station (PBAPS)
- Present the Resolution Strategy
  - Accomplishments
  - Remaining Issues
- Provide Bases for the Resolution Schedule

# Presentation Overview

- Resolution Approach
- Project Configuration
- Accomplishments
- Remaining Analysis Work
- Thermo-Lag Reduction Modifications
- Open Resolution Issues
- Conclusion

# Resolution Approach

## Magnitude of the Issue

- GL 92-08 Thermo-Lag 330-1 Fire Barriers Are Indeterminate; Compensatory Measures are in Place
  - Scope of Encapsulated Raceways at LGS
    - Approximately 4,800 Linear Feet
    - 1 & 3-Hour Barriers
    - Tray, Conduit, Boxes and Gutter
  - Scope of Encapsulated Raceways at PBAPS
    - Approximately 4,400 Linear Feet
    - 3-Hour Barriers
    - Conduit and Boxes

# Resolution Approach

**Ensure Safety; Cost Effectively Resolve The Issue**

- Integrate These Elements to Achieve the Goal of Ensuring Plant Safety, While Cost Effectively Resolving The Thermo-Lag Operability Issue
  - Thermo-Lag Reduction Project
    - Safe Shutdown Re-analysis
  - IPEEE Fire Risk Analyses (GL 88-20, Sup. 4)
    - Solutions Will Not Create Vulnerabilities
  - Fire Barrier Assembly Configuration Evaluations
    - Thermo-Lag Assembly Qualification for 1-Hour Assemblies
    - Alternate Fire Barrier Material Evaluations for 3-Hour Barriers
  - Participation In Industry Programs
    - Support and Stay Current With the Industry
  - Enhance Fire Protection Program Documentation

# Resolution Approach

**Ensure Safety; Cost Effectively Resolve The Issue**

## ■ Resolution Approach

- Underlying Schedule Assumption
  - Unit Outages for Some Required Modifications
    - Installation & Testing

## ■ Schedule Submitted via GL 92-08 RAI Responses

## ■ LGS Barriers in Full Regulatory Compliance

- April 1999
  - Coincides with Unit 2 Outage

## ■ PBAPS Barriers in Full Regulatory Compliance

- October 1999
  - Coincides with Unit 3 Outage



# **Project Configuration**

## **Common Resolution Approach for LGS and PBAPS**

- Integrated Project Using a Common Approach for Resolution at LGS and PBAPS
- VP Station Support, VP LGS, VP PBAPS
- Sponsors
  - Analyses - Director of Nuclear Engineering
    - Engineering Branch (Discipline) Managers
  - Licensing - Director of Licensing
  - LGS Interface - Director Site Support Services
    - Operations, System Managers
  - PBAPS Interface - Director Site Support Services
    - Operations, System Managers

# Project Configuration

## Common Resolution Approach for LGS and PBAPS

### ■ Thermo-Lag Project Manager

- Contractors with Specific Technical Expertise
- PECO Energy FP & SSD Program Managers
- PECO Licensing
- Outsourced & Inhouse Technical Tasks
- Outsourced & Inhouse Technical Reviews

### ■ Modifications

- LGS MOD Project Manager
  - Lead Responsible Engineer
- PBAPS MOD Project Manager
  - Lead Responsible Engineer

# Accomplishments

## Safe Shutdown Re-Analysis

- GL 88-20 Sup. 4, Fire Risk Analyses
  - LGS Submitted June 1995
  - PBAPS Submitted May 1996
- Revised Safe Shutdown Configuration Identified
  - Peer Reviews on Revised Configurations
  - Potential 70% Reduction in Raceway Protection
  - Manual Actions Deemed Reasonable by Operations
  - Major Modifications to Support Revised SSD Methodology Approved for Conceptual Design

# Accomplishments

## Safe Shutdown Re-Analysis

### ■ Redocumenting Fire Protection & Safe Shutdown Analyses

- Improving Documentation
  - For Existing and Revised Supporting Analyses
- Short Term: Maintain the Existing & Planned SSD Analysis Configurations
- Long Term: Facilitate Configuration Control

### ■ Revised Safe Shutdown Configuration Documentation

- Method and System Logics
- Flow Path Analyses
- Component and Cable Selection

# Accomplishments

## Thermo-Lag Barrier Qualification

### ■ Thermo-Lag 330-1 Fire Barrier Evaluations

- Evaluated Existing Assemblies at LGS & PBAPS
  - Identified Bounded Assemblies Using NEI Application Guide
  - Identified Unbounded Assemblies
    - Derived PECO Energy Specific Test Requirements
      - Performed PECO Energy Specific Test
- Verified LGS Barrier Construction - Internal Examination
- 1-Hour Barrier Upgrade Design Requirements Established

### ■ Ampacity Derating Factors Derived

- Derived for All Installed Assemblies
  - Bounded By Industry Testing or,
  - Heat Transfer Analyses Methodology

# Accomplishments

## Thermo-Lag Issues

### ■ Composition

- Verified Using NEI Composition Testing Program

### ■ Thermo-Lag Combustibility

- Improved Combustible Loading Analyses
- Structural Steel Survivability Analyses
  - LGS: Complete
  - PBAPS: Initiated
- Elimination of Thermo-Lag from Combustible Free Zones
  - Alternate Compliance Methodology Analysis

### ■ Fire Barriers Using Other Materials

- Gutter Type Wireway 1-Hour Mecatiss Test
- Test Managed By Florida Power Corp.



# Accomplishments

## Participation in Industry Programs

- NEI Thermo-Lag 330-1 Test Program
  - Provided Input for Configurations Tested
- NEI Application Guide Pilot Program
  - Derived a Methodology to Use the Application Guide
  - Presented to NRC December 1995
- NEI Thermo-Lag Composition Testing
  - Tested Material Samples From All Units
- NEI Fire Protection Working Group
  - Director of Licensing
- Florida Power Corp. - Mecatiss Testing
  - Tested Gutter Wireway in a Shared Test
- Witness Installation of Other Fire Barrier Materials
  - Darnat KM-1 & Mecatiss

# Remaining Analysis Work

## Issues With The Potential to Require Modifications

- Application of Ampacity Derating Factors to Encapsulated Cables
  - Cable Replacement or Reroute
- Time Line Analyses
  - Emergency Lighting Installation
- Electrical Coordination
  - MHIF\* and Breaker/Fuse Coordination Reviews
    - Breaker/Fuse Replacements
- Structural Steel Survivability Analysis (PBAPS)
  - Fire Retardant Coating of Structural Steel
  - Removal of Thermo-Lag

\*MHIF - Multiple High Impedance Fault

# Thermo-Lag Reduction Modifications

## Unit Outage Modification Process Schedule

### ■ Modifications Requiring Outage Work are Planned Per the Following Schedule

- To Ensure Quality Design & Configuration Control
- Support Outage Planning

<b>MOD Status</b>	<b>Schedule</b>
• SMMG* 1	Initiate Conceptual Design
• SMMG* 2	Outage Start - 18 months
• Rev 0	Outage Start - 9 months
• PIMS Planned	Outage Start - 6 months
• Ready to Work	Outage Start - 3 months
• Unit Outage Start	

\*SMMG - Station Modification Management Group

# **Thermo-Lag Reduction Modifications**

## **Outage Modification Review Process**

### **Review Team**

- Coordinated by Thermo-Lag Project Manager
- Site Modification Project Managers (Lead)
- Appropriate System Engineers
- Modification Engineers
- Operations
- Health Physics
- Management Approval of Evaluation

# **Thermo-Lag Reduction Modifications**

## **Outage Modification Review Process**

### **Modification Review Criteria**

- **Installation Requirements**
  - Non-Outage/System-Outage/Unit-Outage
- **Functional Testing Requirements**
  - Non-Outage/System-Outage/Unit-Outage
- **ALARA Concerns for Design, Installation, & Testing**
  - Non-Outage/System-Outage/Unit-Outage

# Thermo-Lag Reduction Modifications

## LGS Modifications

### ■ Safety Related System Circuit Modifications

- Requires Disabling Safety Systems to Install & Test Modifications
- Requires Completion and Acceptance of Work During LCOs
- Risk: Assurance That the Modification & Testing can be Completed Within the LCO
- Unit Outage is Required for Higher Risk Modifications

### ■ Enhance or Install Local Control Capability

- Provide Transfer and Control Capability for RHR Valves at MCC
  - Control Circuits can be modified during System Outages;  
Two (2) Valves are Pressure Isolation Valves
    - IST Requirement: Unit Outage Required for Functional Testing
      - Unit 1 Outage, April 1998
      - Unit 2 Outage, April 1999



# Thermo-Lag Reduction Modifications

## LGS Modifications

### ■ Modifications Which Do Not Require Unit Outages

- Other Local Control and Instrumentation Enhancements
- Installation of Circuit Isolation Devices
- Re-Routing Safe Shutdown Cables
  - Route Cables to Eliminate the Requirement for Cable Protection
- Raceway Fire Barrier Encapsulation Modifications
- Emergency Lighting for New Operator Manual Actions

# **Thermo-Lag Reduction Modifications**

## **PBAPS Modifications**

### **■ Modification to Re-Define Fire Areas**

- Fire Rate Structural Walls
  - Insights From IPEEE Fire Risk Analyses
- Unit Outage Required for Personnel ALARA Concerns
  - Walkdowns - Unit 3 Outage, 10/97
  - Installation - Unit 3 Outage, 10/99

### **■ Modifications Which Do Not Require Unit Outages**

- Modification to Increase Off-Site Power Availability
- Raceway Fire Barrier Encapsulation Modifications
- Emergency Lighting for New Operator Manual Actions

# Open Resolution Issues

## LGS and PBAPS

- Issues With the Potential to Change the Resolution Strategy
  - PBAPS: Exemption Request
    - Install Suppression or 3-Hour Rated Fire Barriers
  - LGS: Deviations
    - Install Suppression or 3-Hour Rated Fire Barriers
- Issues With the Potential to Impact the Resolution Schedule
  - Identification & Resolution of Safe Shutdown Analyses Anomalies
  - Changes in Regulatory Safe Shutdown Implementation Guidance
  - Identification of Additional Thermo-Lag 330-1 Issues
  - NRC Acceptance of Ampacity Derating Methodology

# Conclusion

- Provided PECO Energy's Resolution Strategy
- Provided Accomplishments and Statused the Remaining Work
- Identified Risks Associated With Meeting the Existing Schedule
- PECO Energy Remains Committed to 1999 Resolution